### RCRA

### RCRAInfo CM&E EVALUATION - VIOLATION FORM

EPA ID N								
	lumber	PAD042716084	4			EIN		
Handler Name Spray Products Corporation								
Street	Street 1323 Conshohocken Road							
City	City Norristown State PA Zip Code 19401							
	enerator Status if different from N	otified Status.	LQG 🗌	SQG ☐ CE	sqg [	] (	Closed 🗌	Non-Handler
	Change Requir Status Change R		] NO 🛛	If YES, complete the Un	iverse C	hange Se	ction (on reve	rse side of this form).
	n-Notifier?	YES NO	) X If YES, co	omplete the Handler Sec	ction (on	reverse s	ide of this form	۱).
Other Fac	ility Informatio	n Changes? YE	s 🗌 no 🛭	If YES, complete the	Handler	Section	on reverse sic	de of this form).
EVALU	ATION 🖂	Add 🗌 Up	date [			•	de an Evalua equence Nu	ation Identifier (also mber).
Evaluat Identifi	Lyne	*Evaluation (mm/dd/ 7/10/2	<i>(yyyy)</i>	*Agency	Res	sponsib Person WAB		Suborganization WM
SNY, and S CSE, FUI,	to specify Day Zero i SNN, otherwise it de and SNY evaluation		Zero (mm/dd/y except CDI, CSE rt Date. For CDI revious CEI Start	( <b>yyy):</b> , FUI, , 5/3/2007	On. eva	eclassi	Fied SV Date ble for SNY pe as	
4	Notes	:		LQG Inspection - Mu	Itiple Vic	olations		
	☐ Citizen Com	plaint 🗌 Mult	timedia Inspe		npling		Not Subti	tle C
1 1								
	THI 🗍 (	CCI CFI [	Regulat INC	OTHER (spec	ify):	PTX RTI		
Does this	THI C	CCI CFI [ UIC UOI [	Regulat  INC  UWR  Routine/ EMR	tion-Specific FCI  LDR PTE  OTHER (spec  Standardized FCI	ify):	PTX RTI		s Section(s) on page 2
	CAR C	CCI CFI CFI CFI CUIC DOS C	Regulation?	tion-Specific FCI  LDR PTE  OTHER (specific Standardized FCI  IEI S	ify):	RTI es, fill in his form.	the Violations	RAInfo 3007
Does this	THI CAR CO	CCI CFI [ UIC UOI [ PC DOS [ Id/Update/Delete a	Regulation?	tion-Specific FCI  LDR PTE  OTHER (specific Standardized FCI  IEI SI  YES NO	ify):	PTX  RTI  es, fill in his form. es, pleas ormation es, pleas	the Violations e use the RCI Requests and e use the RCI	RAInfo 3007 I Commitments Form.
Does this	THI CAR COS Evaluation Adds Evaluation lines	CCI CFI CFI CFI CUIC DOS COMPC DOS COMPCE DOS COMMITMENT K to a 3007 Reque	Regulation?  Routine/A  Violation?  nt?	tion-Specific FCI  LDR PTE  OTHER (specific Standardized FCI  IEI S  YES NO S  YES NO S	ify):	PTX  RTI  es, fill in his form. es, pleas ormation es, pleas ormation	the Violations e use the RCi Requests and e use the RCi Requests and	RAInfo 3007 I Commitments Form. RAInfo 3007
Does this	CAR C  CE Evaluation Add  Evaluation lin  Evaluation lin  NDING VIOLAT	CCI CFI CFI CUIC DOS COVERED E	Regulation?  Routine/A  Violation?  nt?	tion-Specific FCI  LDR PTE  OTHER (specific FCI  Standardized FCI  IEI S  YES NO  YES NO  YES NO	ify):	PTX  RTI  es, fill in his form. es, pleas remation es, pleas remation	the Violations e use the RCi Requests and e use the RCi Requests and	RAInfo 3007 1 Commitments Form. RAInfo 3007 1 Commitments Form.

Required Fields

RCRAInfo CM&E Evaluation-Violation Form, Page 2 **EPA ID Number Handler Name** PAD042716084 Spray Products Corporation VIOLATIONS SECTION (Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form) VIOLATION Add □ Update Delete Link to Above Evaluation Violation Determined Date Return to Compliance (RTC) Actual RTC Date Seq. No Agency Type (mm/dd/yyyy) Qualifier (mm/dd/yyyy) A RTC Qualifier is required if 265.1S 5/3/2007 0 7/10/2007 entering an Actual RTC Date. Notes: LINK CITATIONS TO ABOVE VIOLATION? YES 🖂 NO If Yes, fill in information below Citation Citation Citation Citation Type Type FR 40 CFR 265.171 VIOLATION Add Link to Above Evaluation □ Update ☐ Delete Violation **Determined Date** Return to Compliance (RTC) Actual RTC Date Seq. No Agency (mm/dd/yyyy) Qualifier (mm/dd/yyyy) Type A RTC Qualifier is required if 265.1 S 5/3/2007 7/10/2007 0 entering an Actual RTC Date. Notes: LINK CITATIONS TO ABOVE VIOLATION? YES 🖂 NO If Yes, fill in information below Citation Citation Citation Citation Туре Type FR 40 CFR 265.173(a) HANDLER SECTION (Fill out if RCRA Non-Notifier) Handler Name Contact Street City Zip Code State County UNIVERSE CHANGE SECTION (Fill out if Universe Change Required) ì. Indicate the Facility's current Universe(s): Indicate the new RCRAInfo Generator Universe: CEG 🖂 LQG SQG Note: All TSD activity changes must be handled by the IOR and Non-Handler Closed cannot be made using this form. Non-Transporter Transporter If the transporter box is checked, you must check at iii. Indicate the new transporter status: Check non-transporter if the facility is least one mode of transportation below: (Only fill out if the facility requires a currently listed in RCRAInfo as a ☐ Air transporter status change) transporter AND no longer transports Water Rail hazardous waste. Other

Highway

February 2006

									IS FORM ppropriate)	
EPA ID Numb	er		Hand	ler Name	)					
PAD0	42716084		Spray	Products	s Corporation	on				
VIOLATION	☐ Add	⊠ Upo	late	☐ Dele	te				Link to Abov	ve Evaluation 🗌
Seq. No	Violation Type	Agen	cy		ined Date Id/yyyy)	Re		to Compliar Qualifier		Actual RTC Date (mm/dd/yyyy)
Notes:	265.1	S		5/3/	2007	0		RTC Qualifier is ering an Actua		7/10/2007
LINK CITATIO	ONS TO AB	OVE VIC	LATIC	N?	YES 🔀	NO [			lf Yes, fill in	information below
Citation Type		Cita	ation			Citatio Type			Citatio	n
SR	25	Pa Cod	e 265a	.173						
				*****						
VIOLATION	☐ Add	⊠ Up	date	☐ Dele	ete				Link to Abo	ve Evaluation 🗌
Seq. No	Violation Type	Agen	icy		ined Date dd/yyyy)	Re	turi	n to Complia Qualifier		Actual RTC Date (mm/dd/yyyy)
Notes:	262.C	S		5/3	/2007	0		RTC Qualifier is tering an Actua		7/10/2007
	ONC TO AD	OVE 1/1/	OL ATIO	2112	\	NO [			If Van fill in	information below
Citation	ONS TO AB	OVE VIC	JLATIC	JN ?	YES 🔀	NO Citatio	<u></u>		ir res, mii in	information below
Туре		Cit	ation			Тур			Citatio	on
FR		262.3	34(a)(2)	)			_			
						L				
VIOLATION	☐ Add	⊠ Uр	date	☐ Del	ete				Link to Abo	ove Evaluation 🗌
Seq. No	Violation Type	Agei	тсу		nined Date (dd/yyyy)	R	_	n to Complia Qualifie	r	Actual RTC Date (mm/dd/yyyy)
Notes:	262.C	S		5/3	3/2007	0		RTC Qualifier intering an Actu		7/10/2007
LINK CITATI	ONS TO AE	OVE VI	OLATI	ON?	YES 🔀	NO			If Yes, fill in	information below
Citation Type		Cit	tation			Citati Typ		Y	Citatio	on
FR		262.3	34(a)(3	)						

February 2006

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RCRAINFO CM&E ADDITIONAL VIOLATIONS FORM (Attach to RCRAInfo CM&E Evaluation – Violation Form, if appropriate)										
EPA ID Numb				ller Name						
PADO	)42716084		Spray	y Products	Corporati	on				
VIOLATION	Add	⊠ Upo	date	☐ Delete	е				Link to Abov	e Evaluation 🗌
Seq. No	Violation Type	Agen	су	Determin (mm/dd		Re		to Complia Qualifier	•	Actual RTC Date (mm/dd/yyyy)
Notes:	262.C	S		5/3/2	007	A RTC Qualifie entering an Ac				7/10/2007
LINK CITATI	ONS TO AB	OVE VIC	LATIC	ON?	YES 🔀	NO			If Yes, fill in i	nformation below
Citation Type		Cita	ation			Citatio Type			Citation	1
FR		40 CFR	262.34	(a)						
VIOLATION	Add	Up	date	☐ Delet	е				Link to Abov	ve Evaluation 🗌
Seq. No Notes:	Violation Type	Ager	осу	Determin (mm/do		R	A	n to Complia Qualifie RTC Qualifier Itering an Actu	<b>r</b> is <b>required</b> if	Actual RTC Date (mm/dd/yyyy)
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Citation Type		Cit	ation			Citati Typ			Citatio	n
VIOLATION	☐ Add	☐ Up	date	☐ Dele	te				Link to Abo	ve Evaluation 🗌
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LINK CITAT	IONS TO A	BOVE VI	OLATI	ON?	YES [	NO			If Yes, fill in	information below
Citation Type		Ci	tation			Citat Typ			Citatio	on

February 2006

			CM&E ADDITIO Alnfo CM&E Evaluatio		.ATIONS FORM Form, if appropriate)	
EPA ID Numb	per	Ha	ındler Name			
PADO	42716084	Sp	ray Products Corporation	on		
VIOLATION	Add	□ Update	☐ Delete		Link to Abo	ve Evaluation 2
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to	Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
Notes:	265.1	S	5/3/2007		Qualifier is <b>required</b> if ng an Actual RTC Date.	7/10/2007
LINK CITATION	ONS TO AB	OVE VIOLA	TION? YES 🖂	NO ]	If Yes, fill in	information below
Citation Type		Citation	1	Citation Type	Citatio	on .
FR		40 CFR 265	5.174			
VIOLATION	☐ Add	⊠ Update	e Delete		Link to Abo	ove Evaluation
Seq. No	Violation Type 262.C	<b>Agency</b> S	Determined Date (mm/dd/yyyy) 5/3/2007	A RTO	O Compliance (RTC) Qualifier C Qualifier is required if ng an Actual RTC Date.	Actual RTC Date (mm/dd/yyyy) 7/10/2007
LINK CITATI	ONS TO AB	OVE VIOLA	TION? YES 🛛	NO 🗌	If Yes, fill in	information below
Citation Type		Citatio	ח	Citation Type	Citatio	on
SS	S	WMA 6018.4	.03(b)(2)			
VIOLATION	Add	⊠ Update	Delete		Link to Abo	ove Evaluation 💋 🔲
Seq. No	Violation Type 262.0	Agency	Determined Date (mm/dd/yyyy) 5/3/2007	ART	o Compliance (RTC) Qualifier C Qualifier is required if ing an Actual RTC Date.	Actual RTC Date (mm/dd/yyyy) 7/10/2007
LINK CITATI	ONS TO A	BOVE VIOLA	TION? YES	NO 🗆	Vf Yes, fill in	information below
Citation Type FR		Citatio		Citation	Citati	on \



Inspection Date _	7/	HY	7
Time Start		j.	
Time Finish			

H	AZARDOUS WASTE I	NSPECTION REPORT	
$\times$	GENERATOR	S Q GENERATOR	etarts: 1636071

_								
Cor	mpany name Spray Prod	lucts						
EP,	A I.D. Number <u>PAD0427</u>	16084 Employer I.D. Nur	nber (EIN)					
Site	Site Address 1323 Conshohocken Rd., Norristown, PA							
Co	County Montgomery Municipality Plymouth Township Zip 19401							
Na	me of Inspector Walt Bai	ir, Solid Waste Specialist						
Nai	me & Title of Responsibl	e Official William Bastian, Vice President						
Per	rson Interviewed Guy Jor	rdan	Telephone ( <u>800</u> ) <u>543-7710</u>					
Ма	iling Address (if different	from above)						
Am	ount of Hazardous Was	te Generated per Month:F	Pounds Kgs					
1.	Site Characterization:							
	STORAGE:   Cont	tainer 🔲 Tanks 🔲 Containment Bldg. 🔲 🛭	Orip Pad Other					
	PBR: Neut	tralization/WWTP 🔲 Reclaim	Other					
	GENERATOR TREATM	MENT ☐ Containers ☐ Tanks [	Containment Bldg. Drip Pad					
2.	Universal Waste:	Large Quantity Handler Small Quantity	/ Handler					
	Universal Waste Ty	ypes						
3.	Hazardous Waste Tra	nsporters:						
	Transporter Name	Maumee Express, Inc	License Number PA-AH 778					
	Transporter Name		License Number					
	Transporter Name		License Number					
4.	Types of hazardous v	waste generated and destination facility (loca	ation & type).					
	Waste Code	Waste Description	Destination Facility					
	D001, D003, F003	Flammable Liquid, Acetone	RINECO					
	D001	Flammable Liquid, Heptane	Benton, Arkansas					
	D001	Waste Aerosols	ARD0981057870					

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Spray Products ID Number PAD042716084 Date July 10, 2007

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	STATUS			REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X	-		-	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
_	×			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
Х				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
Х				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
Х				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
Х				Exception reporting procedures followed	262a.42	262.42	H016
Х				Spill reporting procedures followed	262a.10	262.34(d)	H017
Х				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H02
_							

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Spray Products	ID Number	PAD042716084	Date July 10, 2007
1 - No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non Compliance

#### **STATUS**

1 2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
			CONTAINERS (Subchapter I)			
x			Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X			Containers of hazardous waste in good condition	265a.1	265.171	H026
х			Containers and stored waste compatible	265a.1	265.172	H027
x			Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X			Containers managed to prevent leaks	265a.1	265.173(b)	H029
x			Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X			Container storage areas inspected at least weekly	265a.1	265.174	H031
X			Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
Х			Proper containment and collection systems in place	265a.179		H033
х			Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
×			Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
Х			Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
×			Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

ER-WM-129: Rev. 7/95

#### Commenwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

#### Inspection Report Comments

On this date, Solid Waste Specialist Walt Bair and Compliance Specialist Don Farrell conducted a follow-up hazardous waste generator inspection at this facility. Mr. Guy Jordan granted access to the facility

Date of Inspection July 10, 2007 Identification Number PAD042716084

Company/Facility/Site Name Spray Products Corporation

and was the f	acility guide. The following observations were ma	ade:
a. b. c. d. e. f.	40 C.F.R. Section 265.173(a) – hazardous was 40 C.F.R. Section 265.174 – failure to conduct 40 C.F.R. Section 262.34(a) (2) – failure to lab accumulation dates. 40 C.F.R. Section 262.34(a) (3) and Section 66 containers as "Hazardous Waste". 40 C.F.R. Section 262.34(a) – storage of hazar limit.	ntainers not in good condition. te containers not closed during storage. weekly inspections of storage area. el hazardous waste containers with 018.403(b) (2) of the SWMA – failure to label dous waste in excess of ninety (90) day storage hazardous waste in a way which insures safe pection, containment, and remedial action.
was is  3) The cashould appropriate the cashou	Department received a written response to the instance on May 7, 2007.  an crusher was observed. At the time of inspection of contain all waste material from this operation was priately manage any spills.  Intainers of hazardous waste in the area of the carged accordingly.	on the unit was in operation. Spray Products ithin proper storage containers and
Department. Dedictional net violetaine ik This repo contrained berr here in. Signature	Septimized exposition of the test for the following of the fill interpret as a first test in another extention of more testing and extending entire testing and the extended obtaining entired as a second of testing entired of the extent of the extent of testing of the entired of the extent of the	ons observed unline the instruction.  Tearner's cretzons noted corein, all store  your on December! terrords.  The sotion of the Dopertment. Dothing  one legit settle for any of slutzon himes.  Engly conserved with the tradings on this
Person int	erviewed (signature)	Date
Inspector	(signature)	Date 7//9/07
		Page 4 of 5

# Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

### Inspection Report Comments

Date (	of Inspection July 10, 2007 Identification Number Pa	AD042716084
Compa	ny/Facility/Site Name Spray Products Corporation	
5)	On the ground, between the can crusher and the gate, there was a clear, od the ground and running into a storm drain. Mr. Jordan stated that the mate and that Gilmore and Associates would be coming out to sample the mate suggested that Spray Products take the appropriate measures to limit this uentering the storm drain before a proper analysis is made.	rial just began to appear rial. The Department
6)	The far end of the lot was observed, during the initial inspection on May 3 facility contained approximately 360 drums of waste material. At the time not contain any waste containers. Since the initial inspection, Spray Producopies of manifests to the Department for the disposal of material which was a second container.	of inspection, this area diducts, has provided several
7)	The "Gas House Building" was observed. Mr. Jordan stated that he intend location for the storage of waste materials. At the time of inspection, seve other wastes were observed. Spray Products should ensure that drums storfacility are properly labeled and managed.	ral drums of oil dry and
Produ	nmary, all of the outstanding violations were corrected and there were no neacts should continue to operate in accordance with the Department's regulate provided to the facility.	
Depart Additi violat contai hereir	This inspection report is notice of the findings of an inspection conducted tment. This report is formal notification of any violations observed during ional notification of violations may be issued concerning either violations tions identified as a result of review of laboratory analyses or Department This report does not constitute an order or other appealable action of the ined herein shall be deemed to grant or imply immunity from legal action fon.  Signature by the person interviewed does not necessarily imply concurrence to but does acknowledge that the person was shown the report or that a copy	g the inspection. noted herein, or other records. Department. Nothing r any violation noted with the findings on this
Pers	son interviewed (signațure),	Date
	pector (signature)	



	GENERAL INS	PECTION REPORT	
Type of inspection  Follow - Uf  Facility/Incident Name and Loca	WM Identification Number IADS4L 716084	Entry Time/Date 9:30Am	Exit Time/Date
	roducts Gre		Municipality  Pymouth  County
,			Montgomery
Name, Address of Resonsible O		Title	
William B	•	Telephone	Interviewed?
1323 Cord		800-543-7710	□YES XINO
Norristown,	PA 19401		
REMARKS			
A follow-u	e hazardous waste records	inspection was conducted	August 3 2004
by Solid Waste	specialist Joe Vitelo. Ga	u Jordan uns intervieus	ed during the
IND PELITON.			
The follow	ing records were reviewed	! PCC plan, 25R source	ce reduction, manifests.
1 100 1			
12 ITC flan,	which was retained at the y to date. This plan will n	Cle land plant was review	ed. The plan appeared
complete and	y to date. It's flow will n	tow be rept at the Korr	Stain part it all
TIMES, THE T	orm 25 R covers all waste s	HYCOMS - 11 CHOVE & ACTOR	Can centery.
Return indies u	were received to monitors a	4's PAG463257 and PAG	463142, which were
	the last inspection.		
VIOLATIONS /	Vo violations observed toda	y or during the inspection	of 7/22/64
Sample Collected?	Sample Numbers		
Q YES Q NO	Sample runners	Analyses	
Inspector Name	Inspector Signature	Headquarters	Date
1.	( ) ( ) ( ) ( ) ( )	SERO	8/3/64
Vitello	gue gues	Norr istaun	Telephone 484-250-574/
Person Interviewed Name	Signature of Person Interviewed	Title	Date 2 days C4
Territor	Cter Dra	- Part Englu	Telephone
L			610-633-1417

This document is official notification that a representative of the Department of Environmental Protection inspected the above mentioned facility. The findings of the inspection are shown above and on any attached pages. Violations discovered as a result of this inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses, review of pertinent documents and further investigation. Notification will be forthcoming if such violations are discovered.

Page \_\_\_\_ of \_\_\_\_

# Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

### Inspection Report Comments

Date of Inspection 7/22/04 Identification Number 19042716184
Company/Facility/Site Spray Products
4) 16 downs of waste acetons were observed stored inside the overpacks
All were labeled and dated properly. All were closed. * The horardous
waste inspection log was observed A'nd found to be up to date a complete.
5.) Spray Froducts was able to provide disposal manifests for year 2003
and 2004. The manifests agreered to be properly filled out however,
two manifests did not having return copies from the disposal facilities:
0.) 2/02/04 Munifest # PAG 463257
6.) 3/26/04 Manifest # PAG 463142
Spray Products should contact the disposal facility and request the
signed copy. If after contacting the disposal facility, spray Products
does not veceive the manifest, they should follow the exception reporting
procedures outlined in 40 CFR 262.42.
1) I 2002 11 1 1 20 1 1 1 1 1 1 1 1 1 1 1 1
(a) The 2003 biennial report was submitted to the Department this year.
Training yeards were available for those who handle hazardous waste.
The following was not available but Kept at the Upland, PA plant:
a.) 25R Source Reduction b.) PC Olan
William Broken dated to cotions these documents and subject them to
William Baston pledged to retrieve these documents and subject them to the Department for review. Once received, the Department will document
that these records are kept and a follow-up inspection report will be mailed
to Spray Products. of also include manifest return copies.
No violations observed, pending receipt of records.
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection.  Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted
herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature)
Inspector (signature) Joseph Date 7/22/04
Page Zof Z

# Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

### Inspection Report Comments

Date of Inspection 1/22/04 . Identification Number PAD042716084
Company/Facility/Site_Spray Roduits
On this date, Avouting hazardous waste generator inspection was conducted at Spray Products Corporation in Plymouth Two by PA Department of Environmental Protection Solid Waste Specialist Joe Vitello, William Bastian, Vice President of
Potertion Solid Wate Specialist Top Vitelly, William Bastian Vice President of
Spray Products, granted access for the inspection. Guy Jordan, Plant Engineer
was the facility guide. The following observations were made:
(1) Spray Products is an agrosol canning company for spray paints and
Stray Products is an aerosol canning company for spray paints and solvents (i.e. carburetor cleaner). Some products are their own brand,
others are cannot for private customers.
a.) The only hazardous waste generated during the carring process is waste acetare. This waste is generated through cleaning
is waste acetare. This waste is generated through cleaning
procedures.
2.) One satellite accumulation area is used to store waste acetone. A
single drum was observed labeled and identified inside the paint mixing
building The dryn had a closed funnel in place over the bung hole.
a.) A full drum (55 gallons) was also observed in this building
on top of a secondary containment grate. This drum was also
labeled properly. It was filled this morning and will he dated and
brought to the 90 day storage area.
3.) The 90-day storage area consists of 4, completely enclosed overpacks capable of storing four, 55-gallon days. These overpacks are outside.
within A fenced in portion of the property.
This inspection report is notice of the findings of an inspection conducted by a representative of the
Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other
violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing
contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.
Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature)
( ) ( )
Page Oof 7

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

				A .				
Site	Nam	ne	Spra	ry (voducts ID Number PA 2042714084	_ Date _ 7/2;	2/04		
	1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance							
STA	STATUS PA CIT. FED CIT. LINE							
1	2	3	4	REQUIREMENT	25 PA CODE	40 CFR	NO.	
				Containment Buildings (Subchapter T)				
	Ø			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061	
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062	
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063	
	Level of hazardous waste within unit is below containment walls    Containment   Conta				H064			
	ф			Tracking of waste out of unit by equipment or personnel prevented 265.1101(c)(1)				
	中			No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066	
	Ф			Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067	
	4			Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068	
				Drip Pads (Subchapter S)	ļ		ļ	
	X			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069	
	卫			Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070	
	ф			(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071	
	中			(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072	
	ф			Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073	
	4			Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074	
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075	
	ф			Release reporting requirements met	265a.1	265.443(m)	H076	
	6			Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077	

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site	Nam	ne _ <u>2</u>	50	(ay Products ID Number PAD042716084	Date/	22/04	
			1 - N	o Violation Observed 2 - Not Applicable 3 - Not Determined	4 - Non Com	pliance	
STA	TUS	;					
1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
	X			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
	Ф			Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
	4			Release reported to Department within 24 hours, unless 265a.1 265.196 H			
	Ф			Special requirements for ignitable and reactive wastes 265a.1 265.198 H			
				Special small quantity generator requirements 265a.1 265.201			
				SQG TANKS			
	X			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
	中			Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity  265.201(b)(3)			
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
	中			Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
	中			Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
	中			Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
	Ф			Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
	山			Incompatible waste requirements met	265a.1	265.201(f)	H059

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site	Nam		500 - No.	Violation Observed 2 - Not Applicable 3 - Not Determined	Date 7/2	(	
STATUS PA CIT. FED CIT. LINE 1 2 3 4 REQUIREMENT 25 PA Code 40 CFR NO.							
1	_2_	3	4	REQUIREMENT	25 PA Code	40 CFR	NO.
L				CONTAINERS (Subchapter I)			
Ø				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
M				Containers of hazardous waste in good condition	265a.1	265.171	H026
Ø				Containers and stored waste compatible	265a.1	265.172	H027
8				Containers kept closed except during addition or removal 265a.1 265.173(a) of wastes			
図				Containers managed to prevent leaks	265a.1	265.173(b)	H029
Ø				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
Ø							
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
Ø				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
N C				Containers labeled accurately identify contents	SWMA 6018.403(b)		H037

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### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Spray Products	ID Number	PAD042716084	Date 7/22/04	
1 - No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non Compliance	

#### **STATUS** PA CIT. FED. CIT. LINE 25 PA Code 40 CFR NO. 3 4 REQUIREMENT 262.11 Hazardous waste determination performed on all waste 262a.10 H001 streams Identification Number 262a.10 262.12 H002 X П 262a.10 262.12(c) H003 Authorized transporters only П Subsequent notification requirements met 262a.12(b) H004 冈 Proper manifest used 262a.10 H005 X 262.21 X Manifests filled out correctly and completely 262a.20 H006 262.23 П Manifests signed and routed properly 262a.23(a) H007 Generator waste accumulated on site for 90 days or less 冈 $\Box$ $\Box$ 262a.10 262.34(a) 800H Ø SQG waste accumulated on site for 180 days max unless 262a.10 H009 262.34(e)(f) 200 mile distance rule applies - 270 days Ø 262a.10 H010 SQG waste accumulated on-site never exceeds 6000 kg 262.34(e)(f) X П Satellite accumulation requirements complied with 262a.10 262.34(c) H011 $\bowtie$ П Personnel training program per 265.16 complied with 262a.10 262.34(a)(4) H012 262.34(d) X П П Manifest exception and biennial reports retained for 3 years 262a.10 262.40(a)(b) H013 X П Specified records retained for three years 262a.10 262.40(c) H014 П Biennial reports submitted to the Department (LQG only) 262a.41 262.41 H015 冈 Exception reporting procedures followed 262a.42 262.42 H016 $\Box$ П Spill reporting procedures followed 262a.10 262.34(d) H017 PPC plan developed and implemented 262a.10 H018 $\mathbf{X}$ 262.34(a) M Special requirements followed for international shipments 262a.10 H019 262.50 262.60 冈 Source reduction strategy prepared and available (LQG only) 262a.100 H020 Excluded waste complies with exclusionary requirements 261a.4 261.4 H021

eFact5: 1364567

Inspection Date 7/2/69

ENT Time Start 6:00

Time Finish 12:00

# HAZARDOUS WASTE INSPECTION REPORT GENERATOR GENERATOR

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	Cor	mpany name <u>Spycely</u>	Products Corpe	oration	1.D. 1	Number <u>PADO</u>	42716084
		Address 1323 Cons					
		inty Montgomery					01
	Nar	ne of Inspector	e Vitelb	•			
	Nar	ne & Title of Responsible	e Official William	Bastian, V.P.			
	Per	son Interviewed <u>Guy</u>	Jordan, Plant	Engineer/Mgr.	Tele <sub>l</sub>	ohone ( <u>800)</u> <u>5</u> 3	13-7710
	Mai	ling Address (if different	from above)				
	Am	ount of Hazardous Wast	te Generated per Mor	ith: <u>~ 4000 - 4500</u>	Pound	s	Kgs
100	1.	Site Characterization:					
		STORAGE: 🔀 Cont	ainer 🗌 Tanks [	Containment Bldg. [	Drip Pa	ad Other	
		PBR:	ralization/WWTP [	Reclaim		Other	
		GENERATOR TREATM	MENT ☐ Container	s 🗌 Tanks	☐ Cor	itainment Bldg.	☐ Drip Pad
	2.	Universal Waste: 🔲	Large Quantity Handl	er 🛮 🖾 Small Quai	ntity Hand	ller	
		Universal Waste Ty	rpes				
	3.	Hazardous Waste Trai	nsporters:				
		Transporter Name	Clean Hart	ors	Licer	nse Number <u> <i>PA</i>-</u>	AH D312
				tation		nse Number	17
		Transporter Name			Licer	nse Number	
	4.	Types of hazardous w	aste generated and	destination facility (le	ocation	& type).	
Sec. 198		Waste Code	Waste	Description		Destination	Facility
		D001	Waste Aca	etone		Spring Grove	RRF
		F003				DHD00081 66	29
						08	
				Year 2003	-> C		rs of
				70 6005		altimore	
						MDD 980533	189

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## Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

#### Inspection Report Comments

Date of Inspection 07/21/20	105
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Identification Number PAD042716084

Company/Facility/Site Spray Products Corp.

- 7) The aerosol can crusher, which is no longer in use, was observed. This machine punctured an aerosol can, crushed it, and collected the acetone in a 55-gallon drum. A 55-gallon drum was still attached to the crusher, containing liquid. This drum was not labeled, contrary to 40 CFR §262. 34(c) Line Item H011. Matt Quinn labeled the drum identifying the waste, correcting the violation. The waste aerosol cans are going to be sent to Giant Resources in South Carolina for disposal.
- 8) Next to the can crusher, 44 drums of waste aerosol cans were observed without labels. This is contrary to 40 CFR §262.34(a)(2), (3) and SWMA 6018.403(b)(2). Matt Quinn labeled these drums, thus correcting the violation. Originally, Spray Products did not have these containers labeled due to a misunderstanding of a DOT exemption for shipping hazardous materials as a "commercial commodity". Spray Products researched the exemption during the inspection and found that it did not apply. Spray Products concurred with the Department that these containers of aerosol cans are in fact a hazardous waste and should be managed as such.
- 9) The following paperwork was reviewed and was correct and up to date:
  - a) 2004 and 2005 hazardous waste manifests
  - b) Source Reduction Strategy
  - c) Employee training
  - d) PPC Plan It is recommended that the PPC plan be updated with the Department's new emergency number: 484-250-5900.

In summary, three violations were observed and immediately corrected.

Guy Jordon reviewed this report and retained a copy.

This report does not constitute an order or other appearable action of the bepartment. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Date  $\frac{7}{22} \frac{25}{2005}$ Inspector (signature)

Date  $\frac{37}{22} \frac{2005}{2005}$ 

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing

ER-WM-129: Rev. 7/95

## Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

#### Inspection Report Comments

Date of Inspection	07/21/2005	Identification Number	PAD042716084
Campana (Baa: 1; baa (G;			

Company/Facility/Site Spray Products Corp.

On this date Andrew Haneiko and Joe Vitello, Waste Management Specialists with the PA Department of Environmental Protection, conducted a large quantity hazardous waste generator inspection of Spray Products Corporation. Guy Jordon, Plant Engineer, granted access and was present for the inspection.

The following observations were made:

- 1) Spray Products is an aerosol canning company for spray paints, and solvents. The hazardous waste streams are waste acetone, generated through cleaning procedures and aerosol can crushing, and waste aerosols (flammable contents).
- 2) A tour of the facility was conducted. In Production Line B Area, unused material (dependent on what is being canned) from the filling machine is collected and placed into either 55-gallon drums or a 350-gallon tote for further use as raw material.
- 3) A satellite accumulation drum of waste aerosol cans was observed in the Gas House (a building where propellent is added to the cans) without a proper labeled. This is contrary to 40 CFR §262.34(c) Line Item H011. Matt Quinn, production manager, labeled the drum as hazardous waste and identified it as Waste Aerosol, correcting the violation.
- 4) A satellite accumulation drum of waste acetone was observed outside the paint mixing shed. The drum was properly labeled as hazardous waste and identifying words.
- 5) The weekly inspection checklist for the satellite drum and 90-day storage area were observed to be correct and up to date.
- 6) The 90-day storage area consisted of four pods on containment pallets. Each pallet contained four 55-gallon drums, for a total of 16 drums. The oldest accumulation date observed was 06/20/2005. All drums were labeled properly, dated, and closed.

herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signatu	ire) (L)	LQ: /	Date 7/22/05
Inspector (signature)	110		Date 07/32/2005
			7 Page 4 of 5

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Spray Products, Inc.			Products, Inc.	ID Numbe	er <u>PAD042716084</u>	Date <u>7/21/2005</u>			
	1 - No Violation Observed			Violation Observed	2 - Not Applicable 3 - Not Determined 4 - Non Compliance		pliance		
STA	ATUS	3					PA CIT.	FED CIT.	LINE
1	2	3	4		REQUIREMENT	<u> </u>	25 PA Code	40 CFR	NO.
				со	NTAINERS (Subcha	apter I)			
$\boxtimes$					s managed in compliance with 40 CFR Part 265 262a.10 262.34			H025	

	Ш		Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
$\boxtimes$			Containers of hazardous waste in good condition	265a.1	265.171	H026
$\boxtimes$			Containers and stored waste compatible	265a.1	265.172	H027
M			Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
$\boxtimes$			Containers managed to prevent leaks	265a.1	265.173(b)	H029
$\boxtimes$			Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
$\boxtimes$			Container storage areas inspected at least weekly	265a.1	265.174	H031
$\boxtimes$			Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
$\boxtimes$			Proper containment and collection systems in place	265a.179		H033
$\boxtimes$			Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
		Ø	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
			Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
		$\boxtimes$	Containers labeled accurately identify contents	SWMA		H037

6018.403(b)

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name <u>Spray Products, Inc.</u>	ID Number	ID Number <u>PAD042716084</u>		
1 - No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non Compliance	

**STATUS** 

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
$\boxtimes$				Identification Number	262a.10	262.12	H002
$\boxtimes$				Authorized transporters only	262a.10	262.12(c)	H003
$\boxtimes$				Subsequent notification requirements met	262a.12(b)		H004
$\boxtimes$				Proper manifest used	262a.10	262.21	H005
$\boxtimes$				Manifests filled out correctly and completely	262a.20		H006
$\boxtimes$				Manifests signed and routed properly	262a.23(a)	262.23	H007
$\boxtimes$				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	$\boxtimes$			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	$\boxtimes$			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
			$\boxtimes$	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
$\boxtimes$				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
$\boxtimes$				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
$\boxtimes$				Specified records retained for three years	262a.10	262.40(c)	H014
$\boxtimes$				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
$\boxtimes$				Exception reporting procedures followed	262a.42	262.42	H016
$\boxtimes$				Spill reporting procedures followed	262a.10	262.34(d)	H017
$\boxtimes$				PPC plan developed and implemented	262a.10	262.34(a)	H018
		Ø		Special requirements followed for international shipments	262a.10	262.50 262.60	H019
$\boxtimes$				Source reduction strategy prepared and available (LQG only)	262a.100		H020
$\boxtimes$				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
			T				
			T				



Inspection Date	7/21/2005
Time Start	10:15
Time Finish	15:00

Н	IAZARDOUS WASTE	INSPECTION REPORT
$\boxtimes$	GENERATOR	☐ S Q GENERATOR

	Con	npany name Spray Prod	ducts, Inc.	I.D. Number <u>PAD042716084</u>					
	Site	Address 1323 Conshot	acken Dd. Marrietown, DA						
	Cou	inty Montgomery	Municipality Plymouth	Zip <u>19401</u>					
	Nan	ne of Inspector Andrew	Haneiko and Joe Vitello						
			e Official William Bastian, VP						
	Pers	son Interviewed Guy Jor	rdan T	elephone ( <u>800</u> ) <u>543-7710</u>					
	Mail	ling Address (if different	from above)						
			te Generated per Month: Po						
300		Site Characterization:							
		STORAGE: 🛛 Cont	ainer 🗌 Tanks 🔲 Containment Bldg. 🔲 Dri <sub>l</sub>	Pad Other					
		PBR:	ralization/WWTP 🔲 Reclaim	Other					
		GENERATOR TREATM	MENT Containers Tanks	Containment Bldg.					
	2.	Universal Waste:	Large Quantity Handler Small Quantity H	landler					
		Universal Waste Ty	/pes						
	3.	Hazardous Waste Tra							
		Transporter Name	icense Number PAD987271020						
				icense Number NJD054126164					
		Transporter Name	Clean Harbors Envt. Services	icense Number MAD039322250					
	4.	4. Types of hazardous waste generated and destination facility (location & type).							
e e		Waste Code	Waste Description	Destination Facility					
		D001/F003	RQ Flam. Liquid, Acetone	Southeastern Chemical & Solvent Co., Inc					
				755 Industrial Rd., PO Box 175					
				Sumter, SC 29150					
		EQ Resource Recovery, Inc.							
				36345 Van Born Road					
				Romulus, MI 08023					
		D001/F003	RQ Waste Acetone	Spring Grove Resources Recovery					
				4879 Spring Grove Ave.					
				Cincinnati, OH 45232					

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### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site	Nan	ne <u>S</u> r	oray I	Products, Inc. ID Number PAD042716084	Date <u>9/7/2</u>	2006		
		1	- No	Violation Observed 2 - Not Applicable 3 - Not Determined	4 - Non Com	npliance		
STA	2	3_	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.	
				CONTAINERS (Subchapter I)				
×				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025	
$\boxtimes$				Containers of hazardous waste in good condition	265a.1	265.171	H026	
$\boxtimes$				Containers and stored waste compatible	265a.1	265.172	H027	
X				Containers kept closed except during addition or removal 265a.1 265.173(a)				
$\boxtimes$				Containers managed to prevent leaks	265a.1	265.173(b)	H029	
$\boxtimes$				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment				
$\boxtimes$				Container storage areas inspected at least weekly	265a.1	265.174	H031	
×				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032	
$\boxtimes$				Proper containment and collection systems in place	265a.179		H033	
$\boxtimes$				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034	
×				Containers clearly marked with accumulation date and visible for inspection 262a.10 262.34(a)(2)				
$\boxtimes$				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036	
				Containers labeled accurately identify contents  SWMA  6018.403(b)				

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# Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

### Inspection Report Comments

Date of Inspection September 7, 2006 Identification Number PAD042716084

Company/Facility/Site Name Spray Product, Inc

6)	The manifests were reviewed. Spray Products currently ships hazardous waste to I (ARD981057870) in Benton, AR. The last shipment occurred on 7/20/2006. All n found to be complete and up-to-date.	
7)	Spray Products was reminded that as of September 5, 2006, generators of Hazardo required to begin using the new standard hazardous waste manifests.	ous Waste are
8)	Training records were also reviewed during the inspection. These records were up complete.	-to-date and
9)	The Department received the 2006 Hazardous Waste Biennial Report from Spray 11, 2006. The report was complete.	Products on July
10	) The 90-day storage area weekly inspection log was observed. Inspections are cond basis. The log was up-to-date and found to be complete.	ducted on a weekly
In sun	nmary, no violations were observed. A copy of this report was left at the facility.	
		•
Depart Additi violat T contai herein	ignature by the person interviewed does not necestarily imply conductence with the , but does acknowledge that the person was shown the report of that a copy was left	pection. rein, or other  t. Nothing lation noted  findings on this with the person.
Perso	on interviewed (signature) Date	9-7-06
Inspe	ector (signature) Label Date	9-7-06
		Page 5 of 5

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## Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

#### Inspection Report Comments

Date of	Inspection .	September 7	, 2006	Identification	Number_	PAD042716084
Company	/Facility/Si	te NameSp	ray Produ	ct, Inc		
	recently the second					

On this date, Waste Management Specialist Walt Bair conducted a routine Hazardous Waste Generator Inspection at Spray Products, Inc. in Plymouth Township, Montgomery County. Mr. Guy Jordan granted access to the facility and was the tour guide for the inspection. The following observations were made:

- 1) Spray Products, Inc. is an aerosol canning company for spray paints and solvents. The hazardous waste streams are waste acetone, waste heptane, and waste aerosols. These waste streams are generated through cleaning procedures and during can crushing.
- 2) The Gas House Building was observed. Spray Products uses this building to add propellant and product to the cans. When the production line changes or at the end of the day the machine is cleaned out. This "clean out" material contains acetone and heptane material. At this building 55-gallon satellite accumulation drum was observed. The drum was properly labeled and was closed.
- 3) The 90-day storage area consists of four pods that are completely enclosed. These pods rest on top of containment pallets. Each pod can hold up to four (4) 55-gallon drums. During the inspection two of these pods were filled, for a total of eight (8) drums of hazardous waste. The drums were labeled properly, closed, and dated. The oldest drum in the 90-day storage area had a date of 7/26/06.
- 4) The aerosol can crusher was observed. Mr. Jordan stated that this machine is used to drain the aerosol material from the can and then crush the can for recycling. At the time of inspection, this machine was not running and there was no aerosol liquid remaining at the crusher.
- 5) Mr. Jordan stated that occasionally Spray Products has aerosol cans, which are deemed to be waste for various reasons. These cans are stored in drums at the far end of the lot, and are shipped out every three months. This waste stream is properly labeled and contained.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Inspector (signature) / ////

Date 9-7-06

Page 4 of 5

### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

ID Number PAD042716084 Date 9/7/2006 Site Name Spray Products, Inc. 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance **STATUS** PA CIT. FED. CIT. LINE 25 PA Code 40 CFR REQUIREMENT NO.  $\Box$ Hazardous waste determination performed on all waste 262a.10 262.11 H001 streams H002 262a.10 262.12 冈  $\Box$ Identification Number H003 262a.10 262.12(c)  $\boxtimes$ Authorized transporters only Subsequent notification requirements met H004 262a.12(b)  $\boxtimes$ 262.21 Proper manifest used 262a.10 H005 X H006  $\boxtimes$ Manifests filled out correctly and completely 262a.20 Ø Manifests signed and routed properly 262a.23(a) 262.23 H007  $\boxtimes$ Generator waste accumulated on site for 90 days or less 262a.10 262.34(a) 800H  $\boxtimes$ SQG waste accumulated on site for 180 days max unless 262a.10 262.34(e)(f) H009 200 mile distance rule applies - 270 days  $\boxtimes$  $\Box$ SQG waste accumulated on-site never exceeds 6000 kg 262a.10 262.34(e)(f) H010  $\boxtimes$ Satellite accumulation requirements complied with 262a.10 262.34(c) H011 П 262a.10 H012 Personnel training program per 265.16 complied with 262.34(a)(4) M  $\Box$  $\Box$ 262.34(d)  $\boxtimes$  $\Box$ Manifest exception and biennial reports retained for 3 years 262a.10 262.40(a)(b) H013 262a.10 H014 Specified records retained for three years 262.40(c)  $\boxtimes$  $\boxtimes$ Biennial reports submitted to the Department (LQG only) 262a.41 262.41 H015 262.42 H016  $\boxtimes$  $\Box$ Exception reporting procedures followed 262a.42 Spill reporting procedures followed 262a.10 262.34(d) H017 M PPC plan developed and implemented 262a.10 262.34(a) H018 Ø Special requirements followed for international shipments 262a.10 262.50 H019  $\Box$ 262.60 262a.100 H020 Source reduction strategy prepared and available (LQG only)  $\boxtimes$ Excluded waste complies with exclusionary requirements 261a.4 261.4 H021 П  $\Box$ П



Inspection Date 9/7/2006

Time Start	10:00 AM
Time Finish	

H	IAZARDOUS WASTE	INSPECTION REPORT
$\boxtimes$	GENERATOR	S Q GENERATOR

Company name Spray Products, Inc.				I.D. Number <u>PAD042716084</u>				
Site	e Address <u>1323 Consh</u>	ohocken Rd., Norristown, PA						
Со	unty Montgomery	Municipality Plymouth Tow	/nship	Zip <u>19401</u>				
Na	me of Inspector Walt B	air		**************************************				
Na	me & Title of Responsi	ble Official William Bastian, Vice President						
Pei	rson Interviewed Guy J	ordan	Tele	phone ( <u>800</u> ) <u>543</u>	-7710			
Ма	iling Address (if differe	nt from above)						
Am	ount of Hazardous Wa	ste Generated per Month: >2200	Poun	ds	Kgs			
1.	Site Characterization	1:						
	STORAGE: 🛛 Cor	ntainer 🗌 Tanks 🔲 Containment Bldg	. 🔲 Drip F	ad Other				
	PBR: Nei	utralization/WWTP 🔲 Reclaim		Other	· <u>, · · · · · · · · · · · · · · · · · ·</u>			
	GENERATOR TREAT	MENT Containers Tanks	☐ Co	ntainment Bldg.	Drip Pad			
2.	Universal Waste:	Large Quantity Handler Small Qu	ıantity Har	ıdler				
	Universal Waste	Гуреѕ	J					
3.	Hazardous Waste Transporters:							
	Transporter Name Freehold Cartage, Inc			License Number PA-AH 0067				
	Transporter Name Maumee Express, Inc.			License Number PA-AH 778				
	Transporter Name			License Number				
<b>4</b> .	Types of hazardous waste generated and destination facility (location & type).							
	Waste Code	Waste Description		Destination Facility				
					Recovery			
	D001, D003,	RQ Flam. Liquid, Acetone		Avonia, VA VAD098443443				
	F003							
	D001	RQ Flam. Liquid, Heptane			·			
	D001	Waste Aerosols		and/or				
				DINECO				
			1	RINECO				
				Benton, AR				
			/	ARD098105787	0			
				-				

RCRAInfo CM&E Evaluation-Violation Form, Page 2

EPA ID Number		Handler Name				
PAD042716084		Spray Products, Inc.				
VIOLATIONS SECTION  (Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)						
VIOLATION Add Update	☐ Delete	Link to Above Evaluation				
Seq. No Violation Agency Type Notes:	Determined Dat (mm/dd/yyyy)	Qualifi A RTC Qualifie				
LINK CITATIONS TO ABOVE VIOLAT	ION? YES	NO	If Yes, fill in information below			
Citation Type Citation Citation Type Citation						
VIOLATION Add Update	☐ Delete		Link to Above Evaluation			
Seq. No Violation Type Agency Determined Date (mm/dd/yyyy).  Agency Compliance (RTC) Qualifier (mm/dd/yyyy).  A RTC Qualifier is required if entering an Actual RTC Date.						
LINK CITATIONS TO ABOVE VIOLAT	ION? YES	NO NO	If Yes, fill in information below			
Citation Type Citation Type Citation Type			Citation			
HANDI	LER SECTION (Fi	Il out if RCRA Non-Noti	fier)			
Handler Name		Contact				
Street	1	*				
City	S	State	Zip Code			
County						
UNIVERSE CHANGE SECTION (Fill out if Universe Change Required)						
i. Indicate the Facility's current Universe(s):						
ii. Indicate the new RCRAInfo Generator Universe:  Note: All TSD activity changes must be handled by the IOR and cannot be made using this form.  LQG SQG CEG  Non-Handler Closed						
iii. Indicate the new transporter status: (Only fill out if the facility requires a transporter status change)	1	nsporter  is checked, you must check at ansportation below:  Water Other	Non-Transporter  Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.			

<sup>\*</sup>Required Fields

CCRA

R	CRAInfo CM&E EVA	LUATION - VIO	LATION FORM	DEC (8 ms		
*EPA ID Number						
Handler Name	Spray Products, Inc.					
Street 1323 Consho	phocken Rd.					
City Norristown	State	PA	<b>Zip Code</b> 19401			
Actual Generator Status Check only if different from I		SQG ☐ CES	SQG Closed C	Non-Handler		
	Universe Change Required? (Generator Status Change Required)  YES NO If YES, complete the Universe Change Section (on reverse side of this form).					
RCRA Non-Notifier?	YES NO If YES	6, complete the Handler Sect	ion (on reverse side of this for	m).		
Other Facility Information	on Changes? YES NO	)   If YES, complete the	Handler Section (on reverse s	ide of this form).		
*EVALUATION	Add Update		ou must provide an Eval nown as the Sequence N			
*Evaluation *Type Identifier *Type	*Evaluation Start Date (mm/dd/yyyy)	*Agency	Responsible Person	Suborganization		
OO   CEI	9/7/2006	S	WAB	WM		
You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.  Reclassified SV Date: Only applicable for SNY evaluation type as appropriate.						
Notes		LQG Inspec	tion			
☐ Citizen Con	Evaluation Indicator Field (Check all that apply)  Citizen Complaint					
	Focused Coverage Area Regu	latton-Specific FCI	ion Type PCI)			
_	CCI CFI INC		The state of the s			
THI 🗌 (	JIC UOJ UWR	OTHER (specify	/):			
CAR 🖸 C	PC DOS EMR	e/Standardized FCI	☐ RTI ☐			
Ooes this Evaluation Ad	d/Update/Delete a Violation	? YES NO 🔀	If Yes, fill in the Violation of this form.	s Section(s) on page 2		
Does this Evaluation lin	k to a Commitment?	YES NO	If Yes, please use the RC Information Requests an			
Does this Evaluation lin	to a 3007 Request?	YES NO 🗵	If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.			
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES NO X If Yes, fill in information below.						
*Seq. No. *Violation	1 Type *Agency	*Regulation Citation (Type + Citation) (ex. FR 262.1)		Date Determined (mm/dd/yyyy)		

<sup>\*</sup>Required Fields

If you have any questions about this letter, please contact me at 484-250-5742.

Sincerely,

Walter Bair

Solid Waste Specialist

Waste Management Program

cc: Mr. Bauer

Mr. France

Plymouth Township

Re 30 (GJE07WM)123-19



#### 2 East Main Street Norristown, PA 19401 May 7, 2007

Southeast Regional Office

Phone: 484-250-5960

Fax: 484-250-5961

#### **NOTICE OF VIOLATION**

#### CERTIFIED MAIL NO. 7001 2510 0005 9958 5678

Mr. Guy Jordan
Plant Engineer
Spray Products Corporation
1323 Conshohocken Road
Norristown, PA 19401

Re: Non-Compliance-Hazardous Waste

Spray Products Corporation (Spray Products)

transport in Engraphic and Palestack

ID No. PAD042716084 Plymouth Township Montgomery County

Dear Mr. Jordan:

As a result of an inspection conducted by the Department of Environmental Protection's Southeast Regional Office, Waste Management Program (Department), on May 3, 2007, at the referenced facility, the Department has determined that Spray Products is in violation of the Solid Waste Management Act (SWMA), Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. Section 6018.101 et seq., and the Hazardous Waste Management Rules and Regulations found at 40 C.F.R. Parts 260 to 270 incorporated by reference at 25 Pa. Code Chapters 260a to 270a as follows:

- A. Spray Products has hazardous waste stored in containers which are not in good condition, contrary to 40 C.F.R. Section 265.171.
- B. Spray Products has stored hazardous waste in containers which are not closed, contrary to 40 C.F.R. Section 265.173(a).
- C. Spray Products failed to conduct weekly inspections of all hazardous waste storage areas, contrary to 40 C.F.R. Section 265.174.
- D. Spray Products failed to appropriately label hazardous waste containers with the accumulation date, contrary to 40 C.F.R. Section 262.34(a)(2).

Service of the service of the

RCRAinfo CM&E Enforcement Form, Page 2 Handler Name **EPA ID Number** PAD042716084 Soray Hoducts OFFICE PENALTY SECTION Link to Above Enforcement Update Delete PENALTY Add Penalty Penalty Notes Penalty Amount Type PENALTY PAYMENT Add Update Delete Scheduled Date Paid Date Defaulted Date Scheduled Paid Amount (mm/dd/yyyy) (mm/dd/yyyy) (mm/dd/yyyy) **Amount** \$ \$ Notes: PENALTY PAYMENT Add Update Delete Scheduled Date Paid Date Defaulted Date Scheduled Paid Amount (mm/dd/yyyy) (mm/dd/yyyy) (mm/dd/yyyy) **Amount** \$ \$ Notes: **PENALTY** Delete Link to Above Enforcement Add Update \*Penalty Penalty Amount Penalty Notes Туре PENALTY PAYMENT Add Update Delete Scheduled Date Paid Date Defaulted Date Scheduled Paid Amount (mm/dd/yyyy) (mm/dd/yyyy) (mm/dd/yyyy) **Amount** \$ Notes: PENALTY PAYMENT Add Update Delete Scheduled Date Scheduled Paid Date Defaulted Date Paid Amount (mm/dd/yyyy) Amount (mm/dd/yyyy) (mm/dd/yyyy) \$ \$ Notes: TECHNICAL REQUIREMENT MILESTONE SECTION (Additional Technical Requirement Milestones can be added using the RCRAInfo CM&E Additional Technical Requirement Milestones Form) Add Update Delete Link to Above Enforcement Technical Requirement Number: Technical Requirement Description: Scheduled Completion Date Actual Completion Date Defaulted Date (mm/dd/yyyy) (mm/dd/yyyy) (mm/dd/yyyy)

Notes:

<sup>\*</sup>Required Fields

### RCRAInfo CM&E ENFORCEMENT FORM

*EPA ID Number Handler Name						
PADO42716084 Spray Products Corporation						
*ENFORCEMENT Add Update Delete You must provide an Enforcement Identifier (also known as Seq. No.).						rcement Identifier
Identifier Enforcement Date Activity Agency Type Sub- Responsible Attorney organization Person						Attorney
5/7/2007 S 120 WM WAB						
5-6	Docket No					
Enforcement Notes: 100		/_/				
Is Enforcement Type 380 (Super CA/FO) and part of a Multi-site Consent Agreement/Final Order (CA/FO)?  Yes No Solution If Yes, you must provide the CA/FO Sequence Number below. If You are the lead agency and want to add a Multi-site CAFO, please provide the CA/FO Respondent Name (required) and Notes (as necessary).						
CA/FO Sequence Number:	*	Respondent Name:				
Notes:						
Was there an Appeal?				Dispos	sition Statu	ıs
If Yes, please fill in this Section  ** Appeal Initiated Date	*Appeal Reso	peal Resolved Date		sposition Status Qualifier	<sup>a</sup> Disposition Status Date (mm/dd/yyyy)	
(mm/dd/yyyy)	(mm/dd/yyyy) (mm/dd/yyyy) Quainter (mm/dd/yyyy)					
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If Yes, please fill in Technical Requirem				estone?	∕es 🔯 N	
_INK VIOLATIONS TO THE ABOVE ENFORCEMENT ACTION? Yes No If Yes, please fill in the Section below.  Note: You can link RTC'd violations to an enforcement action.						
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	(ex. FR 262.1)	(mm/dd/yyyy)	RTC'd	(ınım/dd/yyyy)		ualifier is required if n Actual RTC Date
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	26a34	5/3/2007				
5 267C FR	262.34(0)	5/3/2007				
	an all the later and the second secon					
Multimedia Section (Check all that apply)						
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MSW ORP PCB RCA SPC						
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RCRAInfo CM&E Enforcement Form, Page 2 Handler Name **EPA ID Number** xoray Products Corporation PADOUATION PENALTY SECTION **PENALTY** Add Update Delete Link to Above Enforcement Penalty Penalty Notes Penalty Amount Туре PENALTY PAYMENT Add Update Delete Scheduled Date Paid Date Defaulted Date Scheduled Paid Amount (mm/dd/yyyy) **Amount** (mm/dd/yyyy) (mm/dd/yyyy) \$ Notes: Update Delete PENALTY PAYMENT Add Scheduled Date Paid Date Defaulted Date Scheduled Paid Amount (mm/dd/yyyy) Amount (mm/dd/yyyy) (mm/dd/yyyy) \$ \$ Notes: Delete Link to Above Enforcement PENALTY Add Update Penalty Penalty Notes Penalty Amount Type Delete PENALTY PAYMENT Add Update Scheduled Date Scheduled Paid Date Defaulted Date Paid Amount (mm/dd/yyyy) **Amount** (mm/dd/yyyy) (mm/dd/yyyy) \$ \$ Notes: Delete PENALTY PAYMENT Add Update Scheduled Date Paid Date Defaulted Date Scheduled Paid Amount (mm/dd/yyyy) Amount (mm/dd/yyyy) (mm/dd/yyyy) \$ \$ Notes: TECHNICAL REQUIREMENT MILESTONE SECTION (Additional Technical Requirement Milestones can be added using the RCRAInfo CM&E Additional Technical Requirement Milestones Form) Link to Above Enforcement Add Update Delete Technical Requirement Number: Technical Requirement Description: **Actual Completion Date** Defaulted Date Scheduled Completion Date (mm/dd/yyyy) (mm/dd/yyyy) (mm/dd/yyyy) Notes:

<sup>&#</sup>x27;Required Fields



### RCRAInfo CM&E ENFORCEMENT FORM

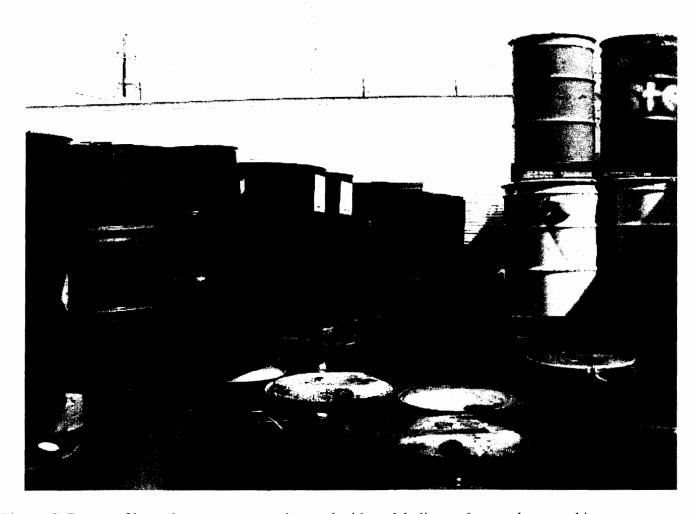
*EPA ID Number		Handler Name					
PAD042716084	Spray Produ	cts Corpora	tion				
*ENFORCEMENT 🗵 Add 🗌	Update Delete	You must pro (also known	vide an Enforcement Identifier as Seq. No.).				
*Identifier *Enforcement Date *Acti (mm/dd/yyyy) Loca	tion Agency Type	organization I	sponsible Person Attorney				
5/7/2007 84		$ \omega $	AB				
56-11017	Docket Number:	_					
Enforcement Notes: NOU IS							
Is Enforcement Type 380 (Super CA/FO) and part of a Multi-site Consent Agreement/Final Order (CA/FO)?  Yes No If Yes, you must provide the CA/FO Sequence Number below. If you are the lead agency and want to add a Multi-site CAFO, please provide the CA/FO Respondent Name (required) and Notes (as necessary).							
*Respondent Name:							
Notes:							
Was there an Appeal? Yes	⊠ No	Dispos	ition Status				
	ppeal Resolved Date	*Disposition Status Qualifier	*Disposition Status Date (mm/dd/yyyy)				
(mm/dd/yyyy) (mm/dd/yyyy) Quainfei (mm/dd/yyyy)							
Does this Enforcement Action Contain Corrective Action Requirements?   Yes   No							
Do you want to link Media?   Yes No If Yes, please fill in Multimedia Section below on page 1 of this form.							
	Do you want to Add/Update/Delete a Technical Requirement Milestone? Yes No If Yes, please fill in Technical Requirement Milestone Section on page 2 of this form.						
_INK VIOLATIONS TO THE ABOVE ENFORCEMENT ACTION? Yes No If Yes, please fill in the Section below.  Note: You can link RTC'd violations to an enforcement action.							
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	7360) 5/3/2007						
S 265.35R 265a							
	346/2) 5/3/2007						
S 262.0 FR 262.3 S 263 I FR 263.1	3 1 1						
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\*Required Fields

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### Inspection Report Comments

Date	of	Inspection	May	3,	2007	Identification	Number	PAD042716084
Compa	ny/	Facility/Si	te Na	me_	Spray Products,	Inc.		



Picture 8: Drums of hazardous waste were observed without labeling and were also stored in a manner which hinders access for inspections and emergency purposes.

This inspection report is notice of the findings of an inspection conducted by a representative of the
Department. This report is formal notification of any violations observed during the inspection.
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violations identified as a result of review of laboratory analyses or Department records.
This report does not constitute an order or other appealable action of the Department. Nothing
contained herein shall be deemed to grant or imply immunity from legal action for any violation noted
herein.
Signature by the person interviewed does not necessarily imply concurrence with the findings on this
report, but does acknowledge that the person was shown the report or that a copy was left with the person.

	The state of the s
Person interviewed (signature)	Date
Inspector (signature)	Date 5-3-07

### Inspection Report Comments

Date of Ins	spection _	May 3,	2007	Identification	Number_	PAD042716084
Company/Fac	cility/Sit	e Name	Spray Products,	Inc.		



Picture 7: Hazardous waste drums were observed to be open.

This inspection report is notice of the findings of an inspect	· -
Department. This report is formal notification of any violations of	observed during the inspection.
Additional notification of violations may be issued concerning eith	her violations noted herein, or other
violations identified as a result of review of laboratory analyses	or Department records.
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contained herein shall be deemed to grant or imply immunity from le	egal action for any violation noted
herein.	
Signature by the person interviewed does not necessarily imply	v concurrence with the findings on this
report, but does acknowledge that the person was shown the report of	
	.,
Person interviewed (signature)	Date
1. 1.	
Inspector (signature) Watt	Date 5-13-07

### Inspection Report Comments

npany/Facility/	Site Name Spray Prod	lucts, Inc.	
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Picture 6: Drums of hazardous waste were observed to be in poor condition. This picture shows several bulging drums.

This inspection report is notice of the findings of an inspection conducte		
Department. This report is formal notification of any violations observed duri		
Additional notification of violations may be issued concerning either violation	s noted he	rein, or other
violations identified as a result of review of laboratory analyses or Departmen	t records.	
This report does not constitute an order or other appealable action of the	Departmen	t. Nothing
contained herein shall be deemed to grant or imply immunity from legal action f	or any vio	lation noted
herein.		
Signature by the person interviewed does not necessarily imply concurrence		
report, but does acknowledge that the person was shown the report or that a cop	y was left	with the person.
Person interviewed (signature)	Date	
Inspector (signature) With D		5-3-07
Inspector (signature)	Date_	3.3.07
		Page 2 of /4

### Inspection Report Comments

Date of Inspection May 3, 2007 Identification Number PAD042716084  Company/Facility/Site Name Spray Products, Inc.    HAZARDOUS WASTE   Family   Facility   Family		Inspection		
HAZARDOUS WASTE  AD042715384 VII.  SAME AND STREET OF THE	Date of Inspection _	May 3, 2007	Identification Number	er PAD042716084
HAZARDOUS WASTE  AD042715384 VII.  SAME AND STREET OF THE	Company/Facility/Sit	e Name Spray Produc	cts, Inc.	
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		works and the seconds of	DH (55)	

Picture 5: Two drums of the waste material were observed with hazardous waste labels.

This inspection report is notice of the findings of an inspection conducted	
Department. This report is formal notification of any violations observed during	_
Additional notification of violations may be issued concerning either violations	noted herein, or other
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Signature by the person interviewed does not necessarily imply concurrence w	with the findings on this
report, but does acknowledge that the person was shown the report or that a copy	was left with the person.
	-
	Data
Person interviewed (signature)	Date
Inspector (signature) / //ath	
Inspector (signature) //74/\times &	Date 5-3-07
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### Inspection Report Comments

Date of	Inspection _	May 3,	2007	Identification	Number_	PAD042716084
Company/	Facility/Sit	ce Name	Spray Products,	Inc.		



Picture 4: Drums of hazardous waste were observed to be damaged and in poor condition.

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Person intervie	ewed (signature)		_Date_	
Inspector (sign	nature) With	2	_Date_	5-3-07

### Inspection Report Comments

Date of 1	Inspection _	May 3,	2007		Identification	Number_	PAD042716084
Company/	Facility/Sit	e Name	Spray	Products,	Inc.		



Picture 3: Approximately 360 drums of hazardous waste are located in the far end of the Spray Products facility.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)	The second secon	Date
Inspector (signature) Late		Date <u>5-3-07</u>

### Inspection Report Comments

Date of	Inspection	May 3,	2007	Identification	Number_	PAD042716084
Company	Facility/Si	te Name_	Spray Products	, Inc.		



Picture 2: Drums of hazardous waste were observed without labels.

This inspection report is notice of the findings of an inspection conducted by a representative of the
Department. This report is formal notification of any violations observed during the inspection.
Additional notification of violations may be issued concerning either violations noted herein, or other
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Person interviewed (signature)	The state of the s	Date	
Inspector (signature) Latt)		_ _Date_	5-3-07

### Inspection Report Comments

Date of Inspection May 3, 2007	Identification Number_	PAD042716084
Company/Facility/Site Name Spray Products,	Inc.	



Picture 1: Hazardous waste drums in the far end of the lot. Many of the drums were unlabeled and some were damaged or observed to be open.

This inspection report is notice of the findings of an inspection conducted by a representative of the
Department. This report is formal notification of any violations observed during the inspection.
Additional notification of violations may be issued concerning either violations noted herein, or other
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Person interviewed (signature) Date

Inspector (signature) Date 5-3-07

ER-WM-129: Rev. 7/95

# Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

### Inspection Report Comments

Date of Inspection <u>May 3, 2007</u>	Identification Number_	PAD042716084
Company/Facility/Site Name Spray Products,	Inc.	
		F F THE STATE OF THE STATE AND ADDRESS OF THE STATE OF TH

- c. Hazardous Waste Manifests The waste manifests for 2006 and 2007 were observed. The manifests were complete and included all "return copies".
- d. The 2006 Hazardous Waste Biennial Report Reviewed and found to be complete.
- e. Training Training records for hazardous waste management for several employees was reviewed and found to be up-to-date.

In summary, eight (8) violations were observed. Spray Products, Inc. should submit a letter to the Department with a plan and schedule for the correction of these violations. A follow-up inspection will occur within fourteen (14) days.

This Inspection regart is bottom of the randoms of in inspection a nametral by a representative of the Department. This report is formal notational notations in section of violations may be issued concerning eather violations noted horsin, or other violations in entified as a result of review of laboratory analyses or Department records.

This report does not constitute an inverse on other upper table with the Department. Nothing contained herein shall be deemed to grant or amply immunity from legal action for any violation notes notes.

Signature by the person interviewed does not need far by imply concurrence with the findings on this report, but does acknowledge that the person was shown the reports or to a copy was left with the person.

Person interviewed (signature)

Date 5-3-07

### Inspection Report Comments

Date of	Inspection	Мау 3,	2007		Identification	Number_	PAD042716084
Company/Facility/Site Name Spray Products, Inc.							
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- 6) At the far end of the lot, Spray Products stores waste aerosol cans which have been determined to be off-spec waste material. At the time of inspection, Mr. Jordan stated that there were approximately 360 drums of waste material at this location within the plant. This waste material has been stored at the facility in excess of one (1) year according to Mr. Jordan. At the time of inspection, the following violations (Pictures 1 through 8) were determined in relation to this area of the facility:
  - a. Several containers of the hazardous waste were observed to be bulging, contrary to 40 CFR 265.171.
  - b. Several waste containers were observed with open lids, contrary to 40 CFR 265.173(a).
  - c. The waste within this area of the facility is not included in the weekly inspection of the hazardous waste storage area, contrary to 40 CFR 265.174.
  - d. With the exception of two containers, the hazardous waste observed did not have labels which identified the material as hazardous waste or listed the accumulation date of the material, contrary to the Solid Waste Management Act 6018.403(b)(2) and 40 CFR 262.34(a)(2) and (3).
  - e. Spray Products has stored the hazardous waste in this area of the facility in excess of 90 days, contrary to 40 CFR 262.34(a).
  - f. Spray Products has stored hazardous wastes in a manner which hinder access for inspection and emergency access, contrary to 25 Pa Code 265.173.
- 7) Hazardous waste is managed by RINECO, and waste is transported by Maumee Express, Inc (NJD986607380) for disposal at RINECO in Benton, AR (ARD981057870). The last hazardous waste shipment occurred on March 28, 2007. Spray Products has a waste pickup for the hazardous waste in the far end of the lot scheduled for May 10<sup>th</sup>.
- 8) The following documents were reviewed:
  - a. Source Reduction Strategy Observed to be complete and up-to-date.
  - b. PPC Plan Observed to be complete an up-to-date.

This inspection report is petite of the findings of an inspection contributed by a representative of t	-75-
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ER-WM-129: Rev. 7/95

# Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

### Inspection Report Comments

Date of Inspection May 3, 2007	Identification Number_	PAD042716084
Company/Facility/Site Name Spray Products,	Inc.	

On this date, Solid Waste Specialist Walt Bair conducted a routine hazardous waste generator inspection at this facility. Mr. Guy Jordan granted access to the facility and was the tour guide for the inspection. The following observations were made:

- 1) Spray Products is listed as a large quantity generator of hazardous waste by the US EPA. Spray Products is an aerosol canning company fro spray paints and solvents. The hazardous waste streams are waste paint, waste heptane and waste aerosol.
- 2) The "Gas House Building" was observed. Propellant and product are added to aerosol cans at this location. At the end of the day or when a production line changes, the machine is cleaned out. The clean out material is placed in a 55-gallon satellite accumulation drum. At the time of inspection one satellite accumulation drum of waste acetone was observed. The drum was properly managed and labeled accordingly.
- 3) The 90-day storage area consists of four pods that are completely enclosed and rest on top of containment pallets. Each pod holds up to four (4), 55-gallon drums of material. During today's inspection the hazardous waste storage area was empty.
- 4) The 90-day, hazardous waste storage area is inspected weekly. Logs of the weekly inspections were observed and found to be complete and up-to-date.
- 5) Spray Products has an aerosol can crusher on site. This machine crushes aerosol cans so they can be recycled, while the material goes into a satellite 55-gallon drum for disposal. The waste generated at this machine is hazardous waste. At the time of inspection an empty 55-gallon drum was observed in the can crushing machine. It is recommended that Spray Products place a hazardous waste label on this drum as soon as the can crushing operation begins to comply with the satellite accumulation requirements.

This inspection report is notice if the tindings of in inspection conducted by a representative of the Depotement. This report is tormal notitication of any viriations observed during the inspection, edditional notification of viriations may be takened a moralisms either viriations noted never, or other viriations identified as a result of review of takenetory analyses or Department records.  This report was not constitute as observed other approaches of the Department. Bothing contained berein shall be deemed to creat or sarry terminate from legal action for any violation noted herein.  Signature by the person interviewed new necessarily capty concurrence with the findings on this report, but does acknowledge that the person cas shown the report or that a copy was left with the person.
Person interviewed (signature)  Inspector (signature)  Date 5-3-0)

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Spray Products	ID Number	PAD042716084	Date May 3, 2007
1 No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non Compliance

STATUS

STA 1 2	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
		CONTAINERS (Subchapter !)			
×		Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
	Х	Containers of hazardous waste in good condition	265a.1	265.171	H026
×		Containers and stored waste compatible	265a.1	265.172	H027
	×	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
x		Containers managed to prevent leaks	265a.1	265.173(b)	H029
	х	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
	X	Container storage areas inspected at least weekly	265a.1	265.174	H031
×		Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
x		Proper containment and collection systems in place	265a.179		H033
×		Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
	×	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
	x	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
	×	Containers labeled accurately identify contents	SVVMA 6018.403(b)		H037

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Spray Products ID Number PAD042716084 Date May 3, 2007

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

**STATUS** 

ა 1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
Х				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
Х				Subsequent notification requirements met	262a.12(b)		H004
х				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
х				Manifests signed and routed properly	262a.23(a)	262.23	H007
			Х	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	Х			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	×			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
×				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
×				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
x				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
×				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
×				PPC plan developed and implemented	262a.10	262.34(a)	H018
×				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
×				Source reduction strategy prepared and available (LQG only)	262a.100		H020
×				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021



# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

Inspection Date  $\frac{5}{5}$ 

# HAZARDOUS WASTE INSPECTION REPORT S Q GENERATOR S Q GENERATOR

Со	mpany name <u>Spray Pro</u>	ducts						
ΕP	A I.D. Number PAD042	716084	Employer I.D. Number (EIN)					
Site	e Address <u>1323 Consho</u>	hocken Rd., Nomistown, PA						
Со	unty <u>Montgomery</u>	Municipality <u>F</u>	Plymouth Township Zip 19401					
Na	me of Inspector Walt B	air, Solid Waste Specialist						
Na	me & Title of Responsit	ole Official William Bastian, V	ice President					
Pe	rson Interviewed Guy Jo	ordan	Telephone ( <u>800</u> ) <u>543-7710</u>					
Ма	iling Address (if differer	nt from above)						
Am	ount of Hazardous Was	ste Generated per Month:	Pounds Kgs					
1.	Site Characterization	:						
	STORAGE: 🛛 Con	tainer 🔲 Tanks 🔲 Cont	ainment Bldg.  Drip Pad Other					
	PBR:	tralization/WWTP 🔲 Recla	aim Other					
	GENERATOR TREAT	MENT Containers	☐ Tanks ☐ Containment Bldg. ☐ Drip Pad					
2.	Universal Waste:	Large Quantity Handler	Small Quantity Handler					
	Universal Waste T	ypes						
3.	Hazardous Waste Tra	ansporters:						
	Transporter Name	Maumee Express, Inc	License Number PA-AH 778					
	Transporter Name		License Number					
	Transporter Name		License Number					
4.	Types of hazardous	waste generated and destin	ation facility (location & type).					
	Waste Code	Waste Descr	iption Destination Facility					
	D001, D003, F003	Flammable Liquid, Ace	etone RINECO					
	D001	Flammable Liquid, Hep	etane Benton, Arkansas					
	D001	Waste Aerosols	ARD0981057870					
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PADO	042716084		Spray Products Corporation							
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February 2006

	RCRAINFO CM&E ADDITIONAL VIOLATIONS FORM (Attach to RCRAInfo CM&E Evaluation – Violation Form, if appropriate)											
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RCRAInfo CM&E Evaluation-Violation Form, Page 2

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i. Indicate	the Facility's	current Univers	e(s):							
1	activity changes	Ainfo Generator must be handled b			Non	l ı-Har	_QG 🔲	SQG [ Closed [	CEG	
					sporter [			Non-	Transporter	
iii. Indicate (Only fill out it transporter sta	the facility red	sporter status: quires a			ox is checked, you must check at transportation below:  Water Other  Check non-transporter if the currently listed in RCRAInf transporter AND no longer transporter in the currently listed in RCRAInf transporter AND no longer transporter in the currently listed in RCRAInf transporter and transporter in the currently listed in RCRAInf transporter and the currently listed in RCRAInf transporter in the			sted in RCRAInfo as a NDD no longer transports		

<sup>\*</sup>Required Fields

### RCRAInfo CM&E EVALUATION - VIOLATION FORM

*EPA ID Number	PAD042716084			EIN							
Handler Name	Spray Products Con	rp <b>Wation</b>	`								
Street 1323 Conshol	nocken Road										
City Norristown		State F	PA	Zip Code	19401						
Actual Generator Status Check only if different from No.	otified Status.	gG □ s	SQG □ CE	sqg 🗌 (	Closed [	Non-Handler					
Universe Change Require (Generator Status Change Re		NO 🛛 I	If YES, complete the Un	iverse Change S	ection (on reve	erse side of this form).					
RCRA Non-Notifier?	YES NO	If YES, co	omplete the Handler Sec	ction (on reverse s	side of this for	m).					
Other Facility Information	n Changes? YES	] NO [≥	If YES, complete the	Handler Section	(on reverse si	de of this form).					
*EVALUATION	Add 🗌 Updat	te 🗌		You must prov known as the S		ation Identifier (also umber).					
*Evaluation *Type Identifier	*Evaluation Star (mm/dd/yyy	*Agency	Responsik Person		Suborganization						
CEI	5/3/2007		S	WAB		WM					
Day Zero (mm/dd/yyyy): You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero.  Reclassified SV Date: Only applicable for SNY evaluation type as appropriate.											
Notes: LQG Inspection - Multiple Violations (\$)											
	Evaluation Indicator Field (Check all that apply)										
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		UWR 🗌	] OTHER (spec	ify):							
THI 🗆 U	nic   noi	Routine/S	Standardized FCI								
THI 🗍 L			Standardized FCI	RTI							
THI 🗆 U	PC DOS	Routine/S	Standardized FCI	RTI	the Violation	ns Section(s) on page 2					
THI C	PC DOS DOS d/Update/Delete a Vi	Routine/S EMR	Standardized FCI IEI  S	If Yes, fill ir of this form	the Violation	ns Section(s) on page 2 CRAInfo 3007 nd Commitments Form.					
CAR C	DIC UOI DOS	Routine/S EMR	Standardized FCI IEI S  YES NO	If Yes, fill ir of this form	the Violation  se use the RO Requests an	CRAInfo 3007					
CAR C  CAR C  Does this Evaluation Ad  Does this Evaluation lin	DIC DOS DOS DICEMBER DOS DOS DICEMBER DOS DOS DICEMBER DOS	Routine/S EMR   iolation?	Standardized FCI IEI S  YES NO S  YES NO S  YES NO S	If Yes, fill in of this form If Yes, plea Information If Yes, plea Information	n the Violation of the Riverse and Requests and see use the Riverse and Requests an	CRAInfo 3007 nd Commitments Form. CRAInfo 3007					
THI CAR CONTROL CA	DIC DOS	Routine/S EMR   iolation?	Standardized FCI IEI S  YES NO S  YES NO S  YES NO S	If Yes, fill in of this form If Yes, plea Information If Yes, plea Information NO NO	the Violation  se use the RC  Requests ar  Requests ar  Requests ar  If Yes, fill in	CRAInfo 3007 nd Commitments Form. CRAInfo 3007 nd Commitments Form.					
THI CAR CONTINUE C	DIC DOS	Routine/S EMR   iolation?	YES NO VALUATION? YES  *Regulation Cita (Type + Citatio	If Yes, fill in of this form If Yes, plea Information If Yes, plea Information NO NO	the Violation  se use the RC  Requests ar  Requests ar  Requests ar  If Yes, fill in	CRAInfo 3007 and Commitments Form. CRAInfo 3007 and Commitments Form. In information below. Date Determined					
THI CAR CONTINUE C	DIC DOS	Routine/S EMR   iolation?	YES NO VALUATION? YES  *Regulation Cita (Type + Citatio	If Yes, fill in of this form If Yes, plea Information If Yes, plea Information NO NO	the Violation  se use the RC  Requests ar  Requests ar  Requests ar  If Yes, fill in	CRAInfo 3007 and Commitments Form. CRAInfo 3007 and Commitments Form. In information below. Date Determined					
THI CAR CONTINUE C	DIC DOS	Routine/S EMR   iolation?	YES NO VALUATION? YES  *Regulation Cita (Type + Citatio	If Yes, fill in of this form If Yes, plea Information If Yes, plea Information NO NO	the Violation  se use the RC  Requests ar  Requests ar  Requests ar  If Yes, fill in	CRAInfo 3007 and Commitments Form. CRAInfo 3007 and Commitments Form. In information below. Date Determined					
THI CAR CONTINUE C	DIC DOS	Routine/S EMR   iolation?	YES NO VALUATION? YES  *Regulation Cita (Type + Citatio	If Yes, fill in of this form If Yes, plea Information If Yes, plea Information NO NO	the Violation  se use the RC  Requests ar  Requests ar  Requests ar  If Yes, fill in	CRAInfo 3007 and Commitments Form. CRAInfo 3007 and Commitments Form. In information below. Date Determined					
THI CAR CONTINUE C	DIC DOS	Routine/S EMR   iolation?	YES NO VALUATION? YES  *Regulation Cita (Type + Citatio	If Yes, fill in of this form If Yes, plea Information If Yes, plea Information NO NO	the Violation  se use the RC  Requests ar  Requests ar  Requests ar  If Yes, fill in	CRAInfo 3007 and Commitments Form. CRAInfo 3007 and Commitments Form. In information below. Date Determined					

<sup>\*</sup>Required Fields

			•.	•	• • • • • • • • • • • • • • • • • • •

#### Commonwells of Penergironia Superment of Contramental Recorres Surem of Waste Monocoment

### Inspection Report Comments

Date of Inspection	2124/93	Ider	tification Number	РАВОНА	716084
Company/Facility/Site	Name _SPRAY PR	CONUCTS	<del></del>		
	Ealmana	24,1993 an	inspertion	uas	. •
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a too	in of the st	ant revealed	1 that so	ray Prof	ucts Inc.
		a tsD. Priò			
had store	d waste our	es a go day	pound	and un	,
permitted ,	for storage.	On 1983 th	o campany	* notife	ed tho
EPA and th	o Pepartmen	t that it is	not a i	-SD Face	lity.
TO J	dentify the a	ared status	of this	company	it
is sugges	tod that so	say Products	Thi. Au	bnit o	
subsequent	PPA notif	uotion and	DER notif	cation	form
to the Dep	asknent. T	hese completed	1 forms	will be	
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		inspection report, each lit the body of the regulation			
tion report as a ref	erence to obtain a detail	iled description of compli	ience requirements.	•	•
		ition that a representative e installation. The finding:			
tion report shall ser	ve a formal notification (	of any violations which w	rere observed durin	g the inspection	. Violetions may also
		uits of laboratory analyses violations indicated hereir			
This report doe.	s not constitute en ordei	r or other appealable action	on of the Departme		
		egal action for any violati des not necessarily imply		the findings on	this report, but does
		the report or that a copy			
Parena Interviewed Inione	- can O.O.K.	- 2/24/43		Nate	
ा करणा सारवास्त्रमञ्जूषा (उन्होंसा) र	buan miken	~ ~ ^/.`		VIU	1-4102
inspector (signature)	suan miker	DOUNN		Date	134143
					Page of

### Pennsylvania Department of Environmental Resources Bureau of Wasie Management

# Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

			1-N	o Violation Observed 2-Not Applicable 3-Not Determined 4-Non-	Compliance
	Sta	itus		DECHIDENTAL	Clation
1	2	3	4	REQUIREMENT	40 CFR Part 268
				Generators	
				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)
				Dilution not used as a substitute for treatment.	3
				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6
				Storage Facilities	
	X			Facility verifies generators classification of waste in accordence with waste analysis plan.	25 Pa Code 265.13(c)
	X			Containers marked to identify contents and accumulation date.	50(a)(2)
	X			Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)
	X			Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)
	X			Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)
				Treatment Facilities, Including PBR and RRR Facilities	
1				Dilution not used as a substitute for treatment.	3
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)
				Certification and/or notification sent with shipments of waste.	7(b)(4). (b)(5). (b)(6)
			-	Land Disposal Facilities	
				Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)
T			1	Facility land disposes of restricted waste only if it meets applicable treatment standard.	40
T	T	$\top$	1	Facility retains copies of generator notifications and certifications.	7(c)(1)

#### Pennsylvania Department of Environmental Resources Europe of Waste Management

### Hazardous Waste Inspection Report TSD Facilities — Part B (Continued)

			1-1	le Violation Observed 2—Net Applicable 3—Net Determined 4—Nen-Complia	nce
Status		,	REQUIREMENT	Chapter Citation	
1	2	3	4		75.265
	X			Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	(1)(5)
	X			Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	(i)(6)
	X			Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item.	(i)(7)
	X			Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary.	(8)(1)
	X			One employee designated as the primary emergency coordinator either on the premises or on call.	(i)(11)
	X			Facility accepting only PA manifests.	0
	X			Manifest properly completed and routed within time limits (24 hrs.)	(j)(2), (3)
	$\boxtimes$			Manifest discrepancies resolved or reported within time limits.	(j)(10), (11
	X			Written operating record maintained on the premises.	(k)
	X			Written operating record contains description and quantity of wastes and method of treatment, storage or disposal.	(k)(2)(i)
	X			Written operating record contains location and quantity of each hazardous waste.	(k)(2)(ii)
	X			Written operating record contains results of waste analyses and treatability tests.	(k)(2)(iii)
	X			Written operating record contains reports and details of all incidents.	(k)(2)(iv)
	X			Written operating record contains records and results of all inspections.	(k)(2)(v)
	$\Delta$			Written operating record contains required monitoring, testing, and analytical data.	(k)(2)(vi)
	X		_	Written operating record contains closure and post-closure cost estimates	(k)(2)(vii)
	X			All records retained on premises and available for inspection.	(1)
	Х			Quarterly reports submitted to the Department.	(m)
	X			Emissions, discharges, fires, explosions, and groundwater contamination reported as required.	(m)(2)
	X			Groundwater monitoring wells located at approved sites.	(n)(2)
	$\angle$			Adequate protection groundwater maitoring wells.	(n)(7)
	Д			Groundwater sampling and analysis plan on the premises.	(n)(8)
	X			Groundwater quality assessment and abatement outline on the premises.	(n)(14)
	X			Closure plan on the premises and up-to-date.	(o)(2)—(9)
	X			Post-closure plan on the premises and up-to-date.	(o)(10)—(1
	X			Annual closure cost estimate on the premises and up-to-date.	(p)(2)(4)
	X	i		Annual post-closure cost estimate on the premises and up-to-date.	(p)(5)(7)

### Pennsylvenia Department of Environmental Resources Bureau of Wasta Management

### Hazardous Waste Inspection Report TSD Facilities — Part B

				le Violation Observed 2—Not Applicable 3—Net Determined 4—Non-Complis	Chapter
Status		_	REQUIREMENT		
1	2	3	4		75.265
_	X			Part A permit application submitted.	(a)(2), (z)(2
X				Identification number.	(b)
	X			Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department.	(b)(1)
	X			Waste streams not covered by permit approved by the Department before acceptance.	(c)(1)
	X			Chemical and physical analyses repeated as required.	(c)(1)
	X			All waste shipments inspected and sampled.	(c)(2)
	X			Waste analysis plan on-site.	(c)(3)
	X			24 hr. surveillance at active portion.	(d)(2)(i)
	X			Artifical barrier at active portion.	(d)(2)(ii)
	X			Proper signs posted and legible at a distance of at least 25 ft.	(d)(3)
	X	·		Inspection schedule on-site.	(e)(2)
	X			Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction.	(e)(4)
	X			Immediate remedial action taken where a hazard is imminent or has already occurred.	(e)(4)
	X			On the job or classroom personnel training program.	(f)
	X			Records retained for each employee at facility of training, job title, and job description.	(f)(6), (7)
	X			Ignitable or reactive wastes separated from source of ignition or reaction.	(g)(1)
	X			No smoking signs displayed where there are hazards from ignitable or reactive wastes.	(g)(1)
	X			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements.	(g)(2)
	X			Facility maintained/operated to minimize possibility of fire, explosion, or discharge of hazardous waste or hazardous constituents.	(h)(1)
	X			Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	(h)(2)(i)
	X			Facility equipped with a device for summoning outside emerency assistance.	(h)(2)(ii)
	X			Facility equipped with fire control, spill control, and decontamination equipment.	(h)(2)(iii)
	X			Facility equipped with water at adequate volume and pressure to supply fire control equipment.	(h)(2)(iv)
1	X			Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained.	(h)(3)
1	X		1	Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies.	(h)(6)
-	X		(	Contingency plan on-site and implemented.	(i)(1)
1	X			Contingency plan describes action taken by personnel in the event of an emergency.	(i)(3)

ÉA-WM-302: 8/87

### Pennsylvania Department of Environmental Resources Bureau of Waste Management

TS/LQ > LQ

## Hazardous Waste Inspection Report TSD Facilities — Part A

Date of inspection $\frac{2124/93}{}$ Time start	1:00 pm	Time finish _	a:00PM					
Name of inspector BRIAN KOSOWSKI								
Company, installation name SPRAY PRODUCTS								
Location 1323 CONSHO HOCKEN RD								
County MONTGOMERY	_ Municipality	PLYMOUTH TUP						
Identification number PAD 042716084								
Name of responsible official ANDREW ORR								
Title PRESIDENT								
Mailing address PO BOX 737 NORRIST	oun PA	19404						
Area code and telephone number $(215)$ $277-$	1010							
Name of person interviewed ANDREW ORK								
Title								
Mailing address (if different from above)								
Area code and telephone number								
1. Site characterization: NA		·						
a.   Treatment ·   surface impoundments	☐ chemical	□ physical	☐ biological					
b. □ Storage · □ containers	□ tanks	☐ surface impoundments	☐ waste piles					
c. 🗆 Disposal - 🖂 land treatment	□ landfill	☐ incineration	☐ thermal treatment					
d. 🗆 Use 🗆 reuse	□ recycle	□ reclaim						
2. Does the facility generate hazardous wastes? □ No								
3. Types of hazardous waste produced by Hazardous Waste Number: $\mathcal{F}_{OO}$ 3								
4. Are hazardous wastes transported off-site by the faci	ility? □ Yes	<b>∑</b> No	•					

### Commonwealth of Penssylvania Department of Environmental Resources Bureau of Waste Masagement

92

### **Inspection Report Comments**

Date of Inspection 9/30/97 Identification Number PAD042716084
Company/Facility/Site Name SPRAY PRODUCTS
INSPECTION OF THE FACILITY WAS PERFORMED
BY BRIAN KOSOWSKI ON SEPTEMBER 30, 1992,
NO HAZARDOUS WASTE WAS PRESENT DURING
THIS INSPECTION. WASTE STREAMS APPEARED TO BE
HANDLED PROFERLY. THIS FACILITY IS A GENERATOR OF
HAZARDOUS WASTE, HOWEVER; THE FACILITY DOBS NOT TREAT
OR STORE WASTE AND DOES NOT OPERATE AS A TSD. Mr.
ORR WAS NOTIFIED ON THIS DATE THAT SPRAY PRODUCT
SHOULD NOTIFY EPA THAT IT IS NOT A TSD AND
NEVER OPERATED AS A TSD.
LAND BAN AND PAPERWERK WERE REVEIWED AND
IN COMPLIANCE.
NO VILLATIONS WERE NOTED DURING THE INSPECTION
In the ''Requirement'' Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspec-
tion report as a reference to obtain a detailed description of compliance requirements.  This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau
of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspec- tion report shall serve a formal notification of any violations which were observed during the inspection. Violations may also
be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notifica- tion may be forthcoming, concerning any violations indicated herein and listing any additional violations.
This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.
Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
And All
Person Interviewed (signature)
Inspector (signature) Brian Kensushi Date 9-30-92
Page of

### Panarytronic Department of Environmental Resources Surses of Wasta Management

### Hazardous Waste Inspection Report Generators — Part B

_		[	40 A10	letion Observed 2-Net Applicable 3-Net Determined 4-Net	on-Compliance
Status			·	REQUIREMENT	Chapter Citation
1	2	3	4		262
X,				Hazardous waste determination, copies available	.11
$\leq$				Identification number	.12(a)
<				Hazardous waste shipments offered only to licensed transporters	.12(d)
$\langle$				Authorization received from TSD facility for wastes shipped off-site	.13
7				PA manifest used for intrastate shipments	.20(b)
٦	X			Disposer state manifest or EPA format manifest used for out-of-state shipments	,20(c)
7				Manifests filled out properly and completely	.20(c)
7				Manifests routed properly and within time limits (7 days)	.23(e)or(f
Ž	,			Proper U.S. DOT shipping containers or packages	.30(1)
Ž				Shipping containers marked and labeled according to U.S. DOT	
1	abla			Containers of 110 gal. or less marked with required PA label	.30(2)
d			-	Placards offered to transporter	.33
ते			_	Wastes accumulated on-site for less than 90 days	.34(1)
K				Wastes stored in proper containers and properly marked and labeled	.34(2)
Ħ			1	Containers managed in accordance with 265.171177	.34(2)
7			$\neg$	Containers clearly marked with accumulation date and visible for inspection	.34(4)
1	_		$\dashv$	Records ratained at designated location for 20 years	.40
Ť			1	Quarterly reports submitted to the Department	.41
₹			_	Exception reporting procedures followed	.42
Ť	$\forall$		$\top$	Hazardous waste disposal plan, if required	.45
1		$\neg$	$\top$	Spill reporting procedures followed	.46(a)
飞	1			Preparedness, Prevention and Contingency Plan and implemented	.46(e)
1	X		1	Special requirements followed for international shipments	50.53.55.60
1				On the job or classroom personnel training program 265.16	.34(a)(5)
1				Orum accumulation area inspected weekly as per 265.174	.34(a)(3)
+	- †	1	$\top$		
T					
T		1	$\top$		
1					

### Ponnsylvania Department of Environmental Resources Bureau of Wasta Management

# Hazardous Waste Inspection Report Generators — Part A

Date of inspection	9130/92	Time start	20 PM Tir	ne finish 3.00 PM
Name of inspector	BRIAN KOSOWSK	1		
Company, installation	n name SPRAY PRODU	CTS CORPOR	ATION	
	1323			
County MON1	GOMERY	Munici	pality <u>PLYMOU</u>	TH TWP
Identification numbe	r PAD 04271608	₹		···
Name of responsible	official <u>ANDREW</u> C	RK		
Title PRES				· · · · · · · · · · · · · · · · · · ·
•		•	•	404
		277-1010		· · · · · · · · · · · · · · · · · · ·
Name of person into	erviewed_SAME			
Title	``\			
Mailing address (# a	different from above)		~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	
Area code and telep	hone number			
1. Current waste h	anding method:			
a. 🗆 On	site 🗆 treatment,	storage,	☐ disposal	□ PBR
b. 🗆 Gn	-site 🛮 use,	□ reuse,	recycle,	□ reclaim
c. 🛛 Off	f-site 🗆 treatment,	storage,	☐ disposal	D INCINERATION
d. 🗆 Off	i-site 🗆 use,	□ reuse,	☐ recycle,	□ reclaim
2. Amount of hazar	dous waste produced:	11.6		·
	ARTERLY AVERAGE =	4000 155 kg./m	10.	
b	5,000 lbs/	YR kg.ly	r <b>.</b>	
3. Types of hazard Waste Number		ardou <b>s</b> Waste Numb ation Facility	er and destination fa	cility (include location and type). Location and Type
F003	SAFETY KLE	EN	INCINE	ERATION/ALT. ENERG
			LIN	DEN, NT
		•		

### Hazardous Wasta Inspection Report TSD Facilities — Storage (Containers)

1-No Violation Observed 2-Net Aspircable 3-Net Determined 4-Non-	Compliance	
Status REQUIREMENT	26	Charter Citypes 4   265
	ainers17	I 17_ 1(b)173(
Containers are compatible with waste stored.		2 172 <sub>1</sub> b
Containers are closed during storage.	17	3(a)173(
	17	4 174
	17	6 176
	17	7 177(a
Incompatible wastes separated or protected from other materials.	17	7(c)177(
	<b>1</b> 7	5(a)173
	175(a	)(1/172)
Efficient grainage provided from base to sume or collection system.	.75(a)	(2)173(8
Containment sufficient to contain volume of largest container or 10% of total volume of all containers whichever is greater.	175(a)	(3)173(8
Run-on into containment system prevented.	175(b)	178.b)
	175(c	178 e)
At crosure, all hazardous wastes and hazardous waste residues removed. Remaining containers, liners, bases, and soil decontaminated or removed.	178	178 4)
Indoor accumulation of reactive or ignitable waste with less than 20% solids meets beight and configuration criteria ( \$6 feet high, 8 ft x 8 ft 5-foot surrounding aisle space).	179(1)	178 e)(.
Outdoor accumulation of reactive waste with less than 20% solids meets height and configuration criteria (< 9 feet high, 16 ft x 16 ft, 5-lost sisle surrounding group, 12 ft access way).	179(2)	178 e)(2
Minimum setback of 40 feet maintained for outdoor container accumulation of ignitable or reactive wastes.	179(2)	178 e)(2
Accumulation of nonreactive or nonignitable hazardous waste meets height and configuration criteria ) \( \sum \)   feet high.	179(3)	178 e)()
Containers labeled to accurately identify hazardous waste contained.	Act 97 Section 6018.40	

### Penasylvania Department of Environmental Resources Serves of Waste Management

# Hazardous Waste Inspection Report TSD Facilities — Part B (Continued)

			1-1	No Violation Observed 2—Not Applicable 3—Not Determined 4—Non-Compile	·
		etus	,	REQUIREMENT	Chapte
1	2	3	4	Contingency plan describes arrangements agreed to for outside emergency services such as police and	75.26
	X			fire department, hospitals, contractors, etc.	(i)(5)
	X			Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	(i)(6)
	X			Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item.	(i)(7)
	X			Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary.	(i)(8)
	X			One employee designated as the primary emergency coordinator either on the premises or on call.	(i)(11)
	$\langle$			Facility accepting only PA manifests.	0
	X			Manifest properly completed and routed within time limits (24 hrs.)	(j)(2), (3)
	X			Manifest discrepancies resolved or reported within time limits.	G)(10), (11
	$\langle$			Written operating record maintained on the premises.	(k)
				Written operating record contains description and quantity of wastes and method of treatment, storage or disposal.	(k)(2)(i)
	X			Written operating record contains location and quantity of each hazardous waste.	(k)(2)(ii)
	$\langle$			Written operating record contains results of waste analyses and treatability tests.	(k)(2)(iii)
				Written operating record contains reports and details of all incidents.	(k)(2)(iv)
$\downarrow$	$\langle  $			Written operating record contains records and results of all inspections.	(k)(2)(v)
	4			Written operating record contains required monitoring, testing, and analytical data.	(k)(2)(vi)
	$\langle  $			Written operating record contains closure and post-closure cost estimates	(k)(2)(vii)
)	$\langle  $			All records retained on premises and available for inspection.	a)
	1			Quarterly reports submitted to the Department.	(m)
	X			Emissions, discharges, fires, explosions, and groundwater contamination reported as required.	(m)(2)
				Groundwater monitoring wells located at approved sites.	(n)(2)
	X			Adequate protection groundwater maitoring wells.	(n)(7)
)				Groundwater sampling and analysis plan on the premises.	(n)(8)
				Groundwater quality assessment and abatement outline on the premises.	(n)(14)
$\searrow$	1			Closure plan on the premises and up-to-date.	(o)(2)—(9)
)	4			Post-closure plan on the premises and up-to-date.	(o)(10)—(1
2	$\sqrt{}$			Annual closure cost estimate on the premises and up-to-date.	(p)(2)—(4)
$  \rangle$				Annual post-closure cost estimate on the premises and up-to-date.	(p)(5)—(7)

### Peassylvania Department of Environmental Resources Berseu of Waste Management

# Hazardous Waste Inspection Report TSD Facilities — Part B

	1—No Violation Observed 2—Not Applicable 3—Not Determined 4—Non-Compliance						
	Status	REQUIREMENT	Chapter Citation				
1	2 3	4	75.265				
$\perp 2$	1	Part A permit application submitted.	(a)(2), (z)(2)				
	$\downarrow$	Identification number.	<b>(b)</b>				
		Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department.	(b)(1)				
		Waste streams not covered by permit approved by the Department before acceptance.	(c)(1)				
		Chemical and physical analyses repeated as required.	(c)(1)				
		All waste shipments inspected and sampled.	(c)(2)				
		Waste analysis plan on site.	(c)(3)				
		24 hr. surveillance at active portion.	(d)(2)(i)				
		Artifical barrier at active portion.	(d)(2)(ii)				
		Proper signs posted and legible at a distance of at least 25 ft.	(d)(3)				
	(	Inspection schedule on-site.	(e)(2)				
	1	Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction.	(e)(4)				
		Immediate remedial action taken where a hazard is imminent or has already occurred.	(e)(4)				
		On the job or classroom personnel training program.	(f)				
$\rightarrow$		Records retained for each employee at facility of training, job title, and job description.	(f)(6), (7)				
		Ignitable or reactive wastes separated from source of ignition or reaction.	(g)(1)				
		No smoking signs displayed where there are hazards from ignitable or reactive wastes.	(g)(1)				
		Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements.	(g)(2)				
		Facility maintained/operated to minimize possibility of fire, explosion, or discharge of hazardous waste or hazardous constituents.	(h)(1)				
$\rangle$		Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	(h)(2)(i)				
$\times$		Facility equipped with a device for summoning outside emerency assistance.	(h)(2)(ii)				
$\rangle$		Facility equipped with fire control, spill control, and decontamination equipment.	(h)(2)(iii)				
X		Facility equipped with water at adequate volume and pressure to supply fire control equipment.	(h)(2)(iv)				
X		Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained.	(h)(3)				
X		Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies.	(h)(6)				
		Contingency plan on-site and implemented.	6)(1)				
$\times$		Contingency plan describes action taken by personnel in the event of an emergency.	(i)(3)				

### Pennsylvania Department of Environmental Resources Bureau of Waste Management

## Hazardous Waste Inspection Report TSD Facilities — Part A

Date of inspection 41	130/91 Time sta	art 1,20	Time finish _	3:00 PM				
	BRIAN KOSOWSKI							
	ame SPRAY PRODUCT	S CORP.						
	ONSHOHOCKEN R			<u> </u>				
County MONT GOI	NERY	Municipality	PLYMOUTH					
	PAD 042716081							
Name of responsible of	ficial ANDREW ORR							
Title PRESIDER	VY		- <del> </del>					
Mailing address PC	BOX 737 NO	BRISTOUR	PA 19404					
Area code and telephon	e number <u>(215)</u> 271	- 1010						
Name of person intervie	wed 5 SAME							
Mailing address (if diffe	rent from above)							
Area code and telephon	e number							
1. Site characterization	: <i>N</i> /A							
	nent - 🗆 surface impoundments	☐ chemical	□ physical	☐ biological				
b. 🗆 Storag	e · □ containers	☐ tanks	☐ surface impoundments	☐ waste piles				
c. 🗆 Disposa	al - 🗆 land treatment	□ landfill	☐ incineration	☐ thermal treatment				
d. 🗆 Use	□ reuse	□ recycle	☐ reclaim					
2. Does the facility generate hazardous wastes? ☐ Yes ☒ No								
3. Types of hazardous waste produced by Hazardous Waste Number: NA								
4. Are hazardous waste	es transported off-site by the fa	acility? 🗆 Yes	s 🖾 No					

	Handler ID Nu	mber	Har	idler Nam	•1				
			<u>!                                    </u>						
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EVALUATION - VIOLATION - ENFORCEMENT FORM
Handler ID Number Handler Type Date Submitted
PADO42716084 LDF[] TSF[V] INC[] LOG N SOG[] TRA[] 093092
SPRAY PRODUCTS
1323 CONSHOTACKEN RD PLYMOUTH TOWNSHIP
EVALUATION Add Change Delete
Date Number Agency Type Reason Branch Person O 9 8 0 9 2  S C E I O G
AREAS OF EVALUATION ( E - Evaluated NE - Not Evaluated NA - Not Applicable )
GERE GPT TGR DCH DGW DMC DPP CAS
GGRE GRRE TMR DCLE DIN DMR DSI FEA
GLBE GSC TOR DCP DLBE DOR DTR CSS
GMRE GSQ TRR DFR DLF DOT DTT
GOR GEX TWD DGS E DLT DPB DWP
comments SITE IS NOT A TSD. IT IS A LQG. TCCHECK
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION
Agency Number Area Date Determined  Agency Number Area Date Determined  Agency Number Area Date Determined
VIOLATION Add Change Delete Link to Above Evaluation? (Y/N)
Agency Number Area Class Regulation Type Regulation Citation
Returned to Compliance  Date Determined Priority Branch Person Scheduled Actual
Comments
VIOLATION Add Change Delete Link to Above Evaluation? (Y/N)
Agency Number Area Class Regulation Type Regulation Citation
Returned to Compliance
Date Determined Priority Branch Person Scheduled Actual
Comments
☐ Required ☐ Required if 1. 1994 Alba Capacitation only for previously reported data ☐ Not Required by EPA

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ironmental findings ing the in cults of la	on report is offic. Resources, Bureau of this inspection are indicatory analyses arming any violation	of Solid Waste A are shown in the ated. Violations and review of Dep	Management, ins is report. Any s may also be d partment record	spected the aby violations was a violations was a violations was a violation to the contract of the contract o	ove instal hich were n examinat ion will l	llation. uncover tion of be forth
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"Mary Mark"	
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### HAZARDOUS WASTE INSPECTION REPORT Generators - Part A

Date of inspection ///2/88 Time start 2:30 Time finish
Name of inspector CAROL A QUICLEY
Company, installation name SPRAY PRODUCTS INC
LOCATION CONSHOHOCKEN ROAD
County MONTEOMERY Municipality PLYMOUTH TWA
Identification number PAO 0427/6084
Name of responsible official ANDREW ORR
Title . TRESIDENT
Mailing address PO Box 737, NORRISTOWN PA . 19404
Area code and phone no. (215) 277-1010
Name of person interviewed . ANDRIW ORR
Title Same.
Mailing address (if different from above) //
Area code and phone no
1. Current waste handling method:
a.  On-site  treatment  storage,  disposal
b. 🗷 On-site 🗀 use, 🗷 reuse, 🗀 recycle, 🗀 reclaim
c Off-site treatment, storage, disposal
d.  Off-site  use,  reuse,  recycle,  reclaim
2. Amount of hazardous waste produced:  Last hazardous waste generated  and shipped off site was in 198
b kg./до. — 1600 kg/mo was generated kg./yr. IN 1986.
3. Types of hazardous waste produced by Hazardous Waste Number:  \$\int_{00}\int_{F00}\text{3}\$
4. Are hazardous wastes transported off-site by the generator?   Yes  No  Schneider Tark Lines

JECT: RCRA Inspection-SPRAY PRODUCTS, IX. - NORRISTOWN, PA PAID 042716084

DATE: 2/5/88

M: %Gregory A. Koltonuk, Environmental Scientist A-RCRA Enforcement Section (3HWl+)

File

Joseph Kotlinski

Chief

PA\_RCRA Enforcement Section (3HWII)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS
REQUIRED AT THIS TIME.

(F-wastes)

	-		

## Department of Environmental Resources

1875 New Hope Street Norristown, PA 19401 215 631-2420

October 19, 1983

Ar. Andrew Orr, President Spray Products Corporation Box 737 Worristown, PA 19494

Re: Identification No. PAD 042716084

Dear 'hr. Orr:

It has been determined by our staff that you are not a TSD facility or that you qualify under the permit by rule provision in our hazardous waste management rules and regulations.

Therefore, you will not have to submit a Part B hazardous waste permit application and we are returning your Part A application if you previously submitted one to the Department.

This means you no longer have interim status as a TSD facility and you may not engage in this type of activity at your facility. You will not be required to secure a hazardous waste management permit for your facility, but you are still subject to any portion of the hazardous waste management rules and regulations published in the Pennsylvania Bulletin September 4, 1982 which pertain to your facility. This includes the submission of a closure plan if you operated as a treatment storage or disposal facility after November 19, 1980.

If you qualify under the permit by rule provision of the regulations then you may continue to operate as a hazardous waste facility in accordance with NPDES or local sower authority requirements.

This does not release you from Environmental Protection Agency requirements. You will have to contact their Philadelphia Regional Office to verify that you do not have to submit a Part B application to their agency.

If you have any questions concerning this, I can be reached at 631-2420.

Very truly yours,

LAWRENCE H. LUNSK Solid Waste Facilities Supervisor

ce: Plymouth Township Montgomery County Health Commission US FPA (Attn: 3AW32) Division of Hazardous Waste Management Re 30 1879.2

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### Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Waste Management

## **Inspection Report Comments**

Date of Inspection 17 SEP 91 Identification Number PAD042716084
Company/Facility/Site Name SPRAY PRODUCTS
THERE WERE NO DRUMS IN THE HAZARDOUS WASTE
STORAGE AREA DURING THE INSPECT. ACCORDING
TO LAST MANICEST DATED 28 JUN 91 - 34 DRUMS OF
FOOS WORK CHIPPED OFFSITE. FOR INCINEDATION, LAND-BAN
NOTIFICATION ATTACHED TO MANIFEST. NO VIOLATIONS NOTED
DURING THIS INSPECTION.
•
In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.  This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Inspector (signature) Literature Date 1/3CP9/ Page 3 of 3

Recycled Paper

## Hazardous Waste Inspection Report Generators — Part B

	Status		REQUIREMENT	Chapter Citation	
Τ		3 4			
		<u> </u>	Hazardous waste determination, copies available	75.262 (b)	
+			Identification number	(c)(1)	
<u> </u>			Hazardous waste shipments offered only to licensed transporters	(c)(4)	
			Authorization received from TSD facility for wastes shipped off-site	(d)	
<del> </del>	X		PA manifest used for intrastate shipments	(e)(2)	
			Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)	
			Manifests filled out properly and completely	(e)(7)	
T-			Manifests routed properly and within time limits (7 days)	(e)(14) or (1	
T	×		Proper U.S. DOT shipping containers or packages	(f)(1)(i)	
	X		Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)	
	X	.	Containers of 110 gal. or less marked with required PA label	(f)(1)(iii)	
	<del>  ^</del>		Placards offered to transporter	(f)(2)	
			Wastes accumulated on-site for less than 90 days	(g)(1)(i)	
	X		Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii)	
	×		Containers managed in accordance with 75.265(q)(1)—(9)	(g)(1)(iii)	
	X		Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)	
			Records retained at designated location for 20 years	(h)	
			Quarterly reports submitted to the Department	(i)	
	X		Exception reporting procedures followed	(j)	
X			Hazardous waste disposal plan, if required	(1)	
Ţχ			Spill reporting procedures followed	(m)(1)	
			Preparedness, Prevention and Contingency Plan and implemented under revision	(m)(5)	
×			Special requirements followed for international shipments	(0)	
			On the job or classroom personnel training program [75.265(f)] Plant Manager	(g)(1)(6)	
			Drum accumulation area inspected weekly as per 75.265(q)(5)	(g)(1)(iii)	

### Hazardous Waste Inspection Report Generators — Part A

Date of inspection 17 SEP91 Time start 3:450 Time finish 50
Name of inspector MAURA L. TRIMBLE
Company, installation name SPRAY PRODUCTS CORPORATION
Location 1323 CONSHOHOCKEN RD
County MONTE Municipality PLYMOUTH TWP
County MONTEOMERY Municipality PLYMOUTH TWP Identification number PAD 042716084
Name of responsible official ANDROW ORR
Title PIRESIDENT
Mailing address PO BOX 737 NORLISTOWN PA 19404
Area code and telephone number (215) 277.1010
Name of person interviewed SAME
Title
Mailing address (if different from above)
Area code and telephone number
1. Current waste handling method:
a. 🗆 On-site 🗆 treatment, 🗆 storage, 🗆 disposal 🗆 PBR
b. 🗆 On-site 🗆 use, 🗀 reuse, 🗀 recycle, 🗀 reclaim
c. 🗹 Off-site 🗆 treatment, 🗆 storage, 🖊 disposal INCINERATED
d. $^{'}\square$ Off-site $\square$ use, $\square$ reuse, $\square$ recycle, $\square$ reclaim
2. Amount of hazardous waste produced:
a kg./mo.
b. 20,563 169 kg.lyr. 1990 9,250 Kg/gr.
3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).  Waste Number Destination Facility Location and Type
FOO3 SAFETY KLEEN LINDEN NEW JERSEY
(ALETONE)

		٠.	

### Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Waste Management

## **Inspection Report Comments**

Date of Inspection 17 SEP 91	Identification Number PAN 042716084
Company/Facility/Site Name SPRAY PRODUCT	3
THIS PAULITY IS NO FACILITY FOR HAZARDO	LONGER A STORAGE
FACULTY FOR HAZARDO	US WASTE, THEY ARE
STILL A GENERATOR OF	F003,
TSO ACTIVITY CEA	FOOS, SEN IN THE LATE '105, EARLY
STORAGE EIGHTIES.	
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its corresponding obligation as described in the body of the retion report as a reference to obtain a detailed description of This inspection report is official notification that a repres of Waste Management, inspected the above installation. The tion report shall serve a formal notification of any violations be discovered upon examination of the results of laboratory tion may be forthcoming, concerning any violations indicated This report does not constitute an order or other appeals deemed to grant or imply immunity from legal action for an Signature by the person interviewed does not necessari acknowledge that the person was shown the report or that	entative of the Department of Environmental Resources, Bureau findings of this inspection are shown in this report. This inspection which were observed during the inspection. Violations may also analyses and review of Department records. Additional notificated herein and listing any additional violations. The Department is to be action of the Department. Nothing contained herein shall be a violation noted herein.
Person Interviewed (signature)	Date 7/1/7/
Inspector (signature)	Date 1/SEP91

#### Panagyryane Descriment of Environmental Resources Survey of Weste Messgament

## Hazardous Waste Inspection Report TSD Facilities — Storage (Containers)

1—Ne Yiolation Observed 2—Net Assucsale 3—Net Detarmined 4—Nen-Comp	pilance
Startus : REQUIREMENT	Chaster Citston
	[ Jane 1
X	.172 (b)
Containers are closed during storage.	.173(4)
X	.174
	.176
	.177(a,b)
X   Incompatible wastes separated or protected from other materials.	.177(c)
	.178(a)
Containment system has impervious base free of cracks.	. 78 a) 1
$\chi$   Efficient drainage provided from base to sump or collection system.	.178(a)(2
	.178(a)(3
	178(b)
Soilled or leaked waste and accumulated precipitation removed from sump or collection system with sufficient frequency to prevent overflow.	178(c)
At closure, all hazardous wastes and hazardous waste residues removed. Remaining containers, liners, bases, and soil decontaminated or removed.	178(d)
Indoor accumulation of reactive or ignitable waste with less than 20% solids meets height and configuration criteria (≤ 6 feet high, 8 ft x 8 ft., 5-foot surrounding aisle space).	178(e)(1)
Outdoor accumulation of reactive waste with less than 20% solids meets height and configuration criteria   1 \leq 9 feet high, 16 ft x 16 ft, 5-loot aisle surrounding group, 12 ft access way).	.178(e)(Z)
Minimum setback of 40 feet maintained for outdoor container accumulation of ignitable or reactive wastes.	.178(e)(2)
Accumulation of nonreactive or nonignitable hazardous waste meets height and configuration criteria l≤ 9   feet high).	.178(e)(3
	97 tion 3(b)(2)

## Hazardous Waste Inspection Report TSD Facilities — Part B (Continued)

			1-1	No Violation Observed 2—Not Applicable 3—Not Determined 4—Non-Complian	Chapte
Status			4	REQUIREMENT	Citatio
	×			Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	(i)(5)
	¥			Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	(i)(6)
	ý.			Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item.	(i)(7)
	Ϋ́			Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary.	(i)(8)
	X			One employee designated as the primary emergency coordinator either on the premises or on call.	(i)(11)
	<u>/</u> X			Facility accepting only PA manifests.	0
	X			Manifest properly completed and routed within time limits (24 hrs.)	(j)(2), (3)
	χ			Manifest discrepancies resolved or reported within time limits.	(j)(10), (1
	4			Written operating record maintained on the premises.	(k)
	<b>'</b>			Written operating record contains description and quantity of wastes and method of treatment, storage or disposal.	(k)(2)(i)
	ζį			Written operating record contains location and quantity of each hazardous waste.	(k)(2)(ii)
	ζ,			Written operating record contains results of waste analyses and treatability tests.	(k)(2)(iii)
	X			Written operating record contains reports and details of all incidents.	(k)(2)(iv)
	<u>/</u>			Written operating record contains records and results of all inspections.	(k)(2)(v)
	4			Written operating record contains required monitoring, testing, and analytical data.	(k)(2)(vi)
	5			Written operating record contains closure and post-closure cost estimates	(k)(2)(vii)
	χ			All records retained on premises and available for inspection.	(1)
	X			Quarterly reports submitted to the Department.	(m)
	4			Emissions, discharges, fires, explosions, and groundwater contamination reported as required.	(m)(2)
	7			Groundwater monitoring wells located at approved sites.	(n)(2)
	£			Adequate protection groundwater monitoring wells.	(n)(7)
	X			Groundwater sampling and analysis plan on the premises.	(n)(8)
	<b>/</b>			Groundwater quality assessment and abatement outline on the premises.	(n)(14)
	7			Closure plan on the premises and up-to-date.	(0)(2)—(9)
	X			Post-closure plan on the premises and up-to-date.	(o)(10)—(1
	<b>/</b> X			Annual closure cost estimate on the premises and up-to-date.	(p)(2)—(4)
	X.			Annual post-closure cost estimate on the premises and up-to-date.	(p)(5)—(7)

## Hazardous Waste Inspection Report TSD Facilities — Part B

	1—No Violation Observed 2—Not Applicable 3—Not Determined 4—Non-Compliance  Status REQUIREMENT								
		4		Citation 75.265					
	X			Part A permit application submitted.	(a)(2), (z)(2				
	¥			Identification number.	(b)				
	X			Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department.	(b)(1)				
	X			Waste streams not covered by permit approved by the Department before acceptance.	(c)(1)				
	X			Chemical and physical analyses repeated as required.	(c)(1)				
	Υ			All waste shipments inspected and sampled.	(c)(2)				
	χ			Waste analysis plan on-site.	(c)(3)				
	χ			24 hr. surveillance at active portion.	(d)(2)(i)				
	X			Artifical barrier at active portion.	(d)(2)(ii)				
	Y			Proper signs posted and legible at a distance of at least 25 ft.	(d)(3)				
	Ŷ			Inspection schedule on-site.	(e)(2)				
	Ϋ́			Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction.	(e)(4)				
	χ			Immediate remedial action taken where a hazard is imminent or has already occurred.	(e)(4)				
	X			On the job or classroom personnel training program.	(f)				
	X			Records retained for each employee at facility of training, job title, and job description.	(f)(6), (7)				
	X			Ignitable or reactive wastes separated from source of ignition or reaction.	(g)(1)				
	X			No smoking signs displayed where there are hazards from ignitable or reactive wastes.	(g)(1)				
	χ			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements.	(g)(2)				
	χ			Facility maintained/operated to minimize possibility of fire, explosion, or discharge of hazardous waste or hazardous constituents.	(h)(1)				
	X			Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	(h)(2)(i)				
7	X			Facility equipped with a device for summoning outside emerency assistance.	(h)(2)(ii)				
	X			Facility equipped with fire control, spill control, and decontamination equipment.	(h)(2)(iii)				
T	X			Facility equipped with water at adequate volume and pressure to supply fire control equipment.	(h)(2)(iv)				
1	X			Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained.	(h)(3)				
	X			Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies.	(h)(6)				
	Х			Contingency plan on site and implemented.	(i)(1)				
	X			Contingency plan describes action taken by personnel in the event of an emergency.	(i)(3)				

# Hazardous Waste Inspection Report TSD Facilities — Part A

		. 17	SEP 81 -	3.4	-50 Time finish _	5-				
			COON L TRIMI							
•	Company, installation name SPRAY PRODUCTS CORPORATION									
Location	Location 1323 CONSHOHOCKEN RD.									
County	County MONTGOMERY Municipality PLYMOUTH TWP.									
Identific	ation r	number $P$	40 04271608	34						
Name o	f respo	onsible official_	ANDREW O	RR,						
Title	P	RESIDEN	T							
				NORRIST	DUN PA 190	104				
Area co	de and	telenhone num	ber (215) 27	17. 1010		•				
					•					
			11		·					
			',							
Mailing	addres	S (if different fr	om above)							
Area co	de and	telephone num	ber							
1. Site	charac	cterization: ト	J/A							
	<b>a.</b> [	☐ Treatment -	☐ surface impoundments	☐ chemical	□ physical	☐ biological				
	<b>b.</b> 1	□ Storage -	□ containers	☐ tanks	☐ surface impoundments	☐ waste piles				
		•	☐ land treatment	☐ landfill	☐ incineration	☐ thermal treatment				
		□ Use	□ reuse	□ recycle	☐ reclaim	:				
	<b>u</b> . (	036	rease	_ recycle	_ reciain					
2. Does	s the f	facility generate	hazardous wastes?	Yes 🗵 No						
3. Тур	es of h	nazardous waste	produced by Hazardous W	aste Number:						
				N/A						
A Aro	hazard	loue waetos trai	nenorted officite by the fac	ility?	☑ No					

Required only for previously reported data #

Required a

Required if pertinent &

\_\_\_ Not Required by EPA

· · · · · · · · · · · · · · · · · · ·	EPA	4,
	EVALUATION - VIOLATION - ENFORCEMENT FORM	
	HANDLER Date Submit	ted
	ID Number P A D 0 4 2 7 1 6 0 8 4 LDF[] TSF[X] INC[] LOG[] SOG[X] TRA[]	
	SPRAY PRODUCTS CORPORATION	
	Street City City	
	1323 CONSHOHOCKEN RD PLYMOUTH TWP	
	EVALUATION Add Change Detate	
	Date # Number # Agency # Type # Reason Branch Person  O: 9 1: 7 9: 1  S CET 0.6, M.L.	
	Areas of Evaluation ( E - Evaluated, NE - Not Evaluated, NA - Not Applicable )	<u>'</u>
	GOR TGR BCH DOW DOW DHC DPP CAS CAS	
	GPT THR DCL DIN DHR DSI FEA	
	GGR E GRR DCP DLB E DOR E DTR	
	GLB _ E GSC DFR _ DLF DTT	
	CHR GSQ TWO DGS DLT DLT DPB DUP	
	110 1011 10 150 Factor (5150000)	
	VIOLATION Add Change Delete	lugaro
	gency m Number m Area m Class m Regulation Type Regulation Citation	
•		
	Date Determined A Priority Branch Person Scheduled A Actual A	
	Comments	
	VIOLATION Add Change Delete Security Regulation Citation	and the same
	Returned to Compliance Date Determined to Priority Brench Person Scheduled to Actual to	
	Commence of the contract of th	
	VIOLATION Add Change Delete	
	Igency m Number m Area m Class m Regulation Type Regulation Citation	
	Returned to Compliance  Date Determined A Priority Branch Person Scheduled & Actual &	
	Accords	
	VIOLATION Add Change Delete	277
	gency m Number m Area m Class m Regulation Type Regulation Citation	
	Returned to Compliance Date Determined & Priority Branch Person Scheduled & Actual &	
	Communication Control	
	Comments	

<del>-</del> ,		
		"casegg"

### Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Waste Management

## **Inspection Report Comments**

Date of Inspection $\frac{9/30/97}{}$	Identification Number PAD042716084
Company/Facility/Site Name <u>SPRAY PRODUCTS</u>	
INSPECTION OF THE FACIL	ITY WAS PERFORMED
BY BRIAN KOSOWSKI ON SEPTE	
NO HAZARDOUS WASTE	LAS PRESENT DURING
THIS INSPECTION. WASTE STR	EAMS APPEARED TO BE
HANDLED PROFERLY. THIS FAC	LITY IS A GENERATOR OF
HAZARDOUS WASTE, HOWEVER; 1	
OR STORE WASTE AND DOES NO	
ORR WAS NOTIFIED ON THIS DA	
SHOULD NOTIFY EPA THAT	
NEVER OPERATED AS A TSD.	
LAND BAN AND PAPERWERK	WERE REVEIWED AND
IN COMPLIANCE.	
NO VICIATIONS WERE N	CCTEP DURING THE INSPECTION
its corresponding obligation as described in the body of the re tion report as a reference to obtain a detailed description of	
of Waste Management, inspected the above installation. The	entative of the Department of Environmental Resources, Bureau findings of this inspection are shown in this report. This inspection which were observed during the inspection. Violations may also
	nalyses and review of Department records. Additional notifica-
This report does not constitute an order or other appeala	ble action of the Department. Nothing contained herein shall be
	ly imply concurrence with the findings on this report, but does
acknowledge that the person was shown the report or that	a copy was left with the person.
Person Interviewed (signature)	n Date 9-30-92
Inspector (signature) Brian Kennyony	Nate 9-30-92
mopeotal (signature)	Page of

## Hazardous Waste Inspection Report Generators — Part B

	<b>Y</b>		1-No		
Chapter Citation	REQUIREMENT		Status		
262		4	<del></del>		
.11	Hazardous waste determination, copies available				7
.12(8	Identification number	$\neg$			7
.12(0	Hazardous waste shipments offered only to licensed transporters				7
.13	Authorization received from TSD facility for wastes shipped off-site	1		$\top$	₹
.20(1	PA manifest used for intrastate shipments	1		$\top$	7
.20(	Disposer state manifest or EPA format manifest used for out-of-state shipments	1		7	1
.20( §	Manifests filled out properly and completely			1	1
.23(e)oi	Manifests routed properly and within time limits (7 days)	寸		$\top$	1
.30(1	Proper U.S. DOT shipping containers or packages	$\neg \dagger$	_	$\top$	
.30(2	Shipping containers marked and labeled according to U.S. OOT	$\dashv$		$\top$	Ì
.30()	Containers of 110 gal. or less marked with required PA label	_	$\top$	at	1
.33	Plecards offered to transporter -	$\top$		+	₹
.34()	Westes accumulated on-site for less than 90 days	十	_	$\neg \vdash$	t
.34(2	Wastes stored in proper containers and properly marked and labeled	$\top$	+	1	1
.34()	Containers managed in accordance with 265.171177	$\top$			7
.34(4	Containers clearly marked with accumulation date and visible for inspection	1		1	1
.40	Records retained at designated location for 20 years				1
.41	Quarterly reports submitted to the Department				1
.42	Exception reporting procedures followed				1
.45	Hazardous waste disposal plan, if required			$ < \!\! \!  $	
.46(ε	Spill reporting procedures followed				7
.46(	Preparedness, Prevention and Contingency Plan and implemented				1
0.53.55.	Special requirements followed for international shipments			1	
.34(a)(	On the job or classroom personnel training program 265.16				1
.34(a)(	Drum accumulation area inspected weekly as per 265.174			-	1
		$\frac{1}{2}$			$oldsymbol{\dagger}$
		-	-	-	+

# Hazardous Waste Inspection Report Generators — Part A

	Date of incom	action	4130/42	Time start	1:20 PM	т	ima finieh	3100 PM
	Mama of inen	(CIOI)	BRIAN KOS	TIEKI	1 20 111			
				RODUCTS CO	BPORATION	V		
				323 consite				
				725 CAV STT			ml Tu	, ρ
	-		•	6084		-		
			ficial ANDRE	^				
	TitleP			WONK				
				77 110001	(KOULAL D	00 10	1104	
Sec.			ewed_SAME					***************************************
	Title	-					· · · · · · · · · · · · · · · · · · ·	
	Mailing addre	SS (if diffe	erent from above)					
	Area code an	d telephor	ne number					
	1. Current w	vaste hand	King method:					
	a.	☐ On-sit		nt, 🗆 storag	Ie, 🗆	disposal	□ PBF	?
	b.	□ On-site		☐ reuse,		recycle,	☐ recl	aim
	_,	Off-sit	•	•		disposal	100 10	UCINERATION
	d.	☐ Off-sit		□ reuse,	•	recycle,		
Pile.	<b>.</b>	_ 0 0		,	_	,		
d			us waste produced	l: -F - yexh lt	n <b>S</b>			
	a			E = 4000 15 165/18				
	b	15,	,000	אן וכטו	kg./yr.			
			waste produced	by Hazardous Wast	te Number and	destination	facility (inclu	de location and type).
	Waste N	umber		Destination Facili	ty	-	Location	and Type
	F003		SAFETY	KLEEN		INCII	VER ATHO	VIALTI ENE
			.5/11 = 1.7			LI	NDEN, N	J
					P. 12 - 12 - 12 - 12 - 12 - 12 - 12 - 12			

## Hazardous Waste Inspection Report TSD Facilities — Storage (Containers)

	1-4e Viereties O	bserved	2-Ret Assucsere	3-Ret Determines	4Hea-Con	eliance	
3 tares	41	- 1	REQUIRI	MENT			Chaster Citypes
X	Containers n	nanaged to prever	nt leaks and spills. /Def	ective replaced with	good contain	171 ners <sub>171</sub>	17 <u>-</u> .(þ)173
M	Containers a	re compatible wit	h waste stored.			. 172	172(
IXI	Containers a	us crossed arrived s	tor <del>ege</del> .			173	3(a)173
1/1	Container sto	orage area inspect	ed weekly for leaks, det	erioration, etc.		174	. 17-
XII	Containers ho	iding ignitable or	reactive wastes are set	back 15 m (50 ft) from prope	rty line.	176	176
MI	Satisfactory	proceaures followe	d for handling incompati	ble westes.		177	177(a
1 1	.   Incompatible v	vastes separated	er protected from other	meterials,		177	(c)
	Containers acc   precipitation.	umiation areas hav	re containment system ca	pable of collecting and holding s	mils, leaks, and	175	(a)173
X	Containment si	rstem has impervi	ous base free of cracics.			175(a)	)(1/178
XII	Efficient grains	ge provided from	base to sume or collecti	on system.		L75(a)(	(2)173(
1	Containment sur whichever is gr		vorume of largest conta	iner er 10% of total volume of	all containers,	175(a)(	3)173(
XI	Run-on into con	tainment system (	prevented.			175(b)	178 (b)
XI		waste and accumi to prevent overflo	•	ed from sump or collection syste	em with suffi-	1 <b>7</b> 5(c	178 c)
		izaroous wastes a econtaminated or		ques removed. Remaining cont	uners, liners,	.78	178 =)
			onitable waste with less a 8 ft., 5-loot surrounding	than 20% solids meets height ar y aisie souce).	nd configura-	.79(1)	178 <sub>.</sub> e)(
			iste with less than 20% s ot aisle surrounding grou	olids meets beight and configure e, 12 ft access way).	rtica criteria	79(2)	17ε e)(
1 1 1	finimum setback o	if 40 feet maintain	ed for outsoor container a	ccumulation of ignitable or react	ive westes.   1	79(2)	178.e)(
	et high).	nreactive or monigi	ntable hazardous waste n	neets height and configuration co	iteria 1≤9   1	79(3)	178 e)(
:Ca	ontainers labeled	to accurately iden	tify nazaroous waste 🖘	ntained.	İs	ct 97 Section	

## Hazardous Waste Inspection Report TSD Facilities — Part B (Continued)

		1-1	No Violation Observed 2—Not Applicable 3—Not Determined 4—Non-Compile	RCO
Status		1 -	REQUIREMENT	Chapter
1 2	3	4	Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	75.26
X			Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	(i)(6)
X			Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item.	(i)(7)
X			Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary.	(i)(8)
X			One employee designated as the primary emergency coordinator either on the premises or on call.	(i)(11)
X			Facility accepting only PA manifests.	<b>(</b> )
X			Manifest properly completed and routed within time limits (24 hrs.)	(j)(2), (3)
X			Manifest discrepancies resolved or reported within time limits.	G)(10), (11
X			Written operating record maintained on the premises.	(k)
X			Written operating record contains description and quantity of wastes and method of treatment, storage or disposal.	(k)(2)(i)
X			Written operating record contains location and quantity of each hazardous waste.	(k)(2)(ii)
X			Written operating record contains results of waste analyses and treatability tests.	(k)(2)(iii)
X			Written operating record contains reports and details of all incidents.	(k)(2)(iv)
X			Written operating record contains records and results of all inspections.	(k)(2)(v)
X			Written operating record contains required monitoring, testing, and analytical data.	(k)(2)(vi)
X	_		Written operating record contains closure and post-closure cost estimates	(k)(2)(vii)
X			All records retained on premises and available for inspection.	(1)
X			Quarterly reports submitted to the Department.	(m)
X			Emissions, discharges, fires, explosions, and groundwater contamination reported as required.	(m)(2)
X	_		Groundwater monitoring wells located at approved sites.	(n)(2)
X			Adequate protection groundwater maitoring wells.	(n)(7)
X			Groundwater sampling and analysis plan on the premises.	(n)(8)
X			Groundwater quality assessment and abatement outline on the premises.	(n)(14)
M			Closure plan on the premises and up-to-date.	(o)(2)—(9)
X			Post-closure plan on the premises and up-to-date.	(o)(10)—(19
X		-	Annual closure cost estimate on the premises and up-to-date.	(p)(2)—(4)
X			Annual post-closure cost estimate on the premises and up-to-date.	(p)(5)(7)

## Hazardous Waste Inspection Report TSD Facilities — Part B

_			1-1	No Violation Observed 2—Not Applicable 3—Not Determined 4—Non-Complia	nce Chapte		
Status				REQUIREMENT			
			4		75.26		
	X			Part A permit application submitted.	(a)(2), (z)(		
	X			Identification number.	<b>(b)</b>		
	X			Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department.	(ъ)(1)		
	X			Waste streams not covered by permit approved by the Department before acceptance.	(c)(1)		
•	X			Chemical and physical analyses repeated as required.	(c)(1)		
	X			All waste shipments inspected and sampled.	(c)(2)		
	X			Waste analysis plan on-site.	(c)(3)		
	X			24 hr. surveillance at active portion.	(d)(2)(i)		
	X			Artifical barrier at active portion.	(d)(2)(ii)		
	X			Proper signs posted and legible at a distance of at least 25 ft.	(d)(3)		
	X	-		Inspection schedule on-site.	(e)(2)		
	X			Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction.	(e)(4)		
	X			Immediate remedial action taken where a hazard is imminent or has already occurred.	(e)(4)		
	X			On the job or classroom personnel training program.	(f)		
	X			Records retained for each employee at facility of training, job title, and job description.	(f)(6), (7)		
	X			Ignitable or reactive wastes separated from source of ignition or reaction.	(g)(1)		
	X			No smoking signs displayed where there are hazards from ignitable or reactive wastes.	(g)(1)		
	X			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements.	(g)(2)		
	X			Facility maintained/operated to minimize possibility of fire, explosion, or discharge of hazardous waste or hazardous constituents.	(h)(1)		
	X			Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	(h)(2)(i)		
	X			Facility equipped with a device for summoning outside emerency assistance.	(h)(2)(ii)		
	X			Facility equipped with fire control, spill control, and decontamination equipment.	(h)(2)(iii)		
F	X			Facility equipped with water at adequate volume and pressure to supply fire control equipment.	(h)(2)(iv)		
Ī	X			Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained.	(h)(3)		
K	X			Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies.	(h)(6)		
5	X			Contingency plan on-site and implemented.	(i)(1)		
1	X			Contingency plan describes action taken by personnel in the event of an emergency.	(i)(3)		

TSD

# Hazardous Waste Inspection Report TSD Facilities — Part A

			1	¬ 0.4∆						
	Date of inspection $4/30/91$ Time start	1.20 PI	Time finish	3100 11						
	Company, installation name _SPRAY_PRODUCTS									
	Location 1323 CONSHOHOCKEN RP	······································								
	County MONT GOMERY	Municipality	PLYMOUTH							
	Identification number PAD 042716084									
	Name of responsible official ANDREW ORK									
	Title PRESIDENY									
	Mailing address PO BOX 737 WERRISTOUN PA 19404									
	Area code and telephone number (215) 277 - 1010									
Newson										
	Title									
	Mailing address (if different from above)									
	•									
	Area code and telephone number									
	1. Site characterization: N/A		·							
	a.   Treatment -   surface impoundments	□ chemical	□ physical	☐ biological						
	b.   Storage -   containers	□ tanks	☐ surface impoundments	☐ waste piles						
	c. 🗆 Disposal - 🗆 land treatment	□ landfill	☐ incineration	☐ thermal treatment						
	d. 🗆 Use 🗆 reuse 🗓	□ recycle	□ reclaim							
,!										
	2. Does the facility generate hazardous wastes?	s 🖾 No								
	3. Types of hazardous waste produced by Hazardous Was	te Number:	NIA							
	.,		•							
	4. Are hazardous wastes transported off-site by the facilit	ty? 🗆 Yes	₽ No							